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# ENVIRONMENTAL ASSESSMENT BOARD



## ONTARIO HYDRO DEMAND/SUPPLY PLAN HEARINGS

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VOLUME: 176

DATE: Monday, January 11, 1993

BEFORE:

HON. MR. JUSTICE E. SAUNDERS	Chairman
DR. G. CONNELL	Member
MS. G. PATTERSON	Member

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ENVIRONMENTAL ASSESSMENT BOARD  
ONTARIO HYDRO DEMAND/SUPPLY PLAN HEARING

IN THE MATTER OF the Environmental Assessment Act,  
R.S.O. 1980, c. 140, as amended, and Regulations  
thereunder;

AND IN THE MATTER OF an undertaking by Ontario Hydro  
consisting of a program in respect of activities  
associated with meeting future electricity  
requirements in Ontario.

Held on the 5th Floor, 2200  
Yonge Street, Toronto, Ontario,  
Monday, the 11th day of January,  
1993, commencing at 9:00 a.m.


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VOLUME 176  
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B E F O R E :

THE HON. MR. JUSTICE E. SAUNDERS	Chairman
DR. G. CONNELL	Member
MS. G. PATTERSON	Member

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PAUL JONATHAN BURKE,  
BRIAN PAUL WILLIAM DALZIEL,  
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LIST of UNDERTAKINGS

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940.4	Ontario Hydro to undertake to file the document, Nuclear Option Review, and, if it has been filed, ascertain what document it refers to.	30744
940.5	Ontario Hydro undertakes to provide the report, Forecast of Committed Demand Management, October 1992.	30746
940.6	Ontario Hydro undertakes to determine why, with 800 megawatts of committed and 227 megawatts of uncommitted which is 1,027 megawatts totalled to the year 2000 how that relates to 2,384 megawatts - being a greater difference than 71 megawatts.	30755
940.7	Ontario Hydro undertakes to file more complete documentation on short-term analysis: end-use model results, the EEMO model, demand management impacts.	30781
940:8	Ontario Hydro undertakes to provide clarification of point number 2 on page 127 of the load forecast.	30808





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1 ---Upon commencing at 9:03 a.m.

2 THE REGISTRAR: Please come to order.

3 This hearing is again in session. Please be seated

4 THE CHAIRMAN: Since we last met there  
5 have been some further exhibits filed, the details of  
6 which will appear in the transcript of the day. They  
7 have been given numbers 1018 to 1021.

8 ---EXHIBIT NO. 1018: (MRJBC), Witness Statement of  
9 Stan Louttit.

10 ---EXHIBIT NO. 1019: (MRJBC), Witness Statement of  
11 Chief Randy Kapashesit.

12 ---EXHIBIT NO. 1020: (South Bruce), South Bruce  
13 Witness Statements.

14 ---EXHIBIT NO. 1021: (Sierra Club and Cultural  
15 Survival), Testimony on Manitoba  
16 Purchase and Related  
17 Transmission, Dr. John Theberge,  
18 January 4, 1993.

19 THE CHAIRMAN: Mr. Shepherd?

20 MR. SHEPHERD: Mr. Chairman, we are  
21 waiting for an exhibit to be copied for the Panel, and  
22 in any case I think one of the witnesses is not here.

23 THE CHAIRMAN: We are missing one  
24 panelist, I have noticed.

25 MR. B. CAMPBELL: I assume that all of  
the reports on the effects of the weather on traffic  
are affecting the travel of our more far-flung member.  
I will attempt to determine exactly what is happening.

1                   If it is more convenient, Mr. Chairman,  
2 perhaps we could just let the Board know once he  
3 arrives.

4                   THE CHAIRMAN: Okay.

5                   THE REGISTRAR: Please come to order.  
6 This hearing will recess until recalled.

7 ---Recess at 9:05 a.m.

8 ---On resuming at 9:09 a.m.

9                   THE REGISTRAR: Please come to order.  
10 This hearing is again in session. Please be seated.

11                   THE CHAIRMAN: Mr. Shepherd?

12                   MR. SHEPHERD: Thank you, Mr. Chairman.

13                   AMIR SHALABY;  
14                   PAUL BURKE;  
15                   KEN SNELSON;  
16                   BRIAN DALZIEL; Resumed.

17                   CROSS-EXAMINATION BY MR. SHEPHERD (Continued):

18                   Q. Mr. Burke, when we ended the day on  
19 Wednesday we were talking about the natural NUG  
20 forecast.

21                   As I understand what you have said, the  
22 municipal electric generation is not in there, right,  
23 what has been called - excuse me, my throat has decided  
24 not to work this morning - what has been called MUGs or  
25 'municipal utility generation' is not in your natural  
NUG forecast; right?



1 MR. BURKE: A. There is no growth in it.

2 Q. Okay. And we didn't nail down the  
3 industrial NUGs component I guess, at least not from my  
4 point of view, perhaps from yours, because we had a  
5 little problem with the Falconbridge issue. You recall  
6 that discussion about Falconbridge and Kidd Creek?

7 A. Yes.

8 Q. I would like you now to turn to  
9 Exhibit 798, which is a filing by the Association of  
10 Major Power Consumers. I am asking you to look at tab  
11 5 of that exhibit, which I understand you have copied  
12 and before you. And the last page of that -- we have  
13 given you the whole tab so that you can check all the  
14 context, if you wish.

15 The last page of that -- this is headed  
16 up "Potential Future Energy Savings, Kidd Creek", and  
17 under the sub-heading "Cogeneration Initiative" it  
18 talks about a plant of the size 150 megawatts to 175  
19 megawatts.

20 Now, I am not going to ask you whether  
21 that capacity is correct or whether it fits with their  
22 load because obviously you have to maintain customer  
23 confidentiality.

24 What I do want to ask is this. Does the  
25 300 megawatt increase from 1991 to 1998 in your natural

1 NUG projection, is that estimate sufficient in your  
2 professional view to account for the entire industrial  
3 NUG strategy, industrial NUG category, if this 175  
4 megawatts is installed at Falconbridge? Is your  
5 estimate still enough?

6 A. The judgment of the people in the  
7 NUGs division who advised me on what the order of  
8 magnitude of the load displacement NUG forecast should  
9 be was that there were a large number of projects of  
10 various sizes that had different probabilities of  
11 proceeding, and they were comfortable with the number  
12 of 300 megawatts as the likely resultant of all of  
13 those.

14 They certainly are aware of this project  
15 because it has been on the books for quite a while as a  
16 potential load displacement NUG initiative. So the  
17 forecast we have is a combination of initiatives like  
18 this one and the probabilities, subjective  
19 probabilities, because that is what they have to be,  
20 that these will proceed.

21 Q. Mr. Burke, did you find out since  
22 last Wednesday that it has been on the books for some  
23 time?

24 A. No.

25 Q. Didn't you say last Wednesday you

1 didn't know anything about a cogeneration initiative at  
2 Kidd Creek? Did I just misunderstand you then?

3 A. I think you must have, yes.

4 Q. Okay, I'm sorry. And also following  
5 up on that, I had understood that you did this forecast  
6 of natural NUGs using a functional model; that is, you  
7 used a mathematical equation, as I understood it. Now  
8 you are talking about the NUG division. Could you  
9 explain the relationship between the two?

10 A. I think I also said on Wednesday - I  
11 would have to check the transcript to be sure - that  
12 the equation was used in conjunction with advice about  
13 the likely load displacement NUG takeup in the next few  
14 years.

15 In fact, the way -- one of the criteria  
16 for going with this equation was that it produced in  
17 the short term estimates that were consistent in broad  
18 terms with the sorts of numbers that people familiar  
19 with the load displacement NUG industry as it currently  
20 stands in Ontario think is feasible for NUG impacts in  
21 the next few years.

22 Q. It sounds like the NUG division sort  
23 of did a sanity check on the result of your equation.  
24 Is that a fair assessment?

25 A. We worked closely with the NUGs

1 division right through this process.

2 THE CHAIRMAN: I think in Panel One this  
3 was gone into quite a bit about the relationship with  
4 their NUG forecast and the work and interrelationship  
5 with the NUG division. I think that was discussed  
6 quite extensively in Panel One.

7 Has that process changed in any way?

8 MR. BURKE: No.

9 MR. SHEPHERD: Mr. Chairman, you are  
10 recalling a discussion with respect to the natural NUG  
11 forecast in Panel One?

12 THE CHAIRMAN: Well, I'm not going to be  
13 that precise. I recall extensively Mr. Burke talking  
14 about in preparing that forecast working together with  
15 the NUG division, and that there was a fair amount of  
16 evidence about that.

17 MR. SHEPHERD: Q. Mr. Burke, we have  
18 been talking about natural NUG increases from a 1991  
19 base; correct? That is what this discussion is?

20 MR. BURKE: A. Yes.

21 Q. But it is now 1993, and presumably  
22 there have been projects built or committed since 1991;  
23 correct?

24 A. I think we are talking about what  
25 might have happened during the course of 1992?

1                   Then, my understanding is that very  
2 little has actually come in service in the course of  
3 '92, but I could check for you.

4                   Q. That is not what I asked. I asked  
5 built or committed.

6                   A. Okay. The committed, again I could  
7 check for the dates of commitment, but I'm not aware  
8 exactly of what point in time projects are committed.  
9 The estimate though of 300 remaining is still valid  
10 from the 1991 base. I don't know how much of the 300  
11 is already committed.

12                  Q. In fact, you don't even know whether  
13 more than that is committed, do you.

14                  A. I know that considerably less is  
15 committed in total.

16                  Q. Okay. I'm sorry?

17                  A. I understand the total of around 77  
18 megawatts is committed, subject to check, but I don't  
19 know exactly when those particular projects were  
20 committed.

21                  That is the knowledge that again the NUGs  
22 division people have about commitments of this sort,  
23 and frankly, I'm not exactly sure what committed means  
24 in the case of a load displacement NUG. It is  
25 obviously an investment decision in the hands of the



1 people who wish to make it. They can put it on hold at  
2 any time that they wish, they can proceed more rapidly  
3 as --

4 I don't really think it is quite as firm  
5 as if Hydro goes for an Order in Council and suddenly  
6 is in the process of construction.

7 Now actually, looking at my notes I only  
8 have 40 megawatts either committed or under  
9 construction right now in the load displacement NUG  
10 category.

11 Q. Is that natural or is that program-  
12 driven?

13 A. 20 megawatts of that was program-  
14 driven.

15 [9:17 a.m.]

16 Q. So then, I -- I don't want to push  
17 this too far. I guess I'm just trying to understand  
18 what you're saying. If we take out the 20 megawatts of  
19 program driven, then if I understand what you're  
20 saying, since the end of 1991, 20 megawatts of natural  
21 load displacement non-utility generation has been  
22 committed, I guess, or more during that time; is that  
23 right?

24 A. Well, no. What I'm saying is they're  
25 under construction. Twenty -- my information, as I



1 understand what was given to me, 20 megawatts is now  
2 under construction for natural load displacement NUGs.

3 Q. Okay. And then you have no  
4 procedure, as I understand it, for tracking the extent  
5 to which your industrial customers have committed to  
6 self-generate; is that correct?

7 A. The -- the best we have is an annual  
8 load forecast survey that goes to each of our  
9 industrial customers, and, in fact, each of our  
10 customers at which time we ask them what they project  
11 their needs for peak demand to be, and we also include  
12 a survey at the back of that load forecast  
13 questionnaire, which asks about their intentions for  
14 load displacement non-utility generation. And we have  
15 to assess what to make of the information we get,  
16 whether the company has included everything that they  
17 intend to do or whether they have included more than  
18 they intend to do, but this has been going out, the  
19 actual survey to our customers for their load forecast  
20 has been going out for 30 years. The questions about  
21 cogeneration or other events which could cause them to  
22 draw less power from us than they currently do, those  
23 questions have been asked for pretty well as long as  
24 that. But, again, the contents of their answers are  
25 confidential.

1 Q. Do you have a total from that survey?

2 That's not confidential, right?

3 A. A total of what?

4 Q. Total of natural, or self-generation

5 I guess we can call it, that your industrial customers

6 say that they've -- that they're considering going

7 ahead with?

8 A. There are, as I said earlier, a large

9 number of projects that people have indicated - not a

10 large number - there are a number of projects that

11 people have been indicating over the years that they

12 may go ahead with, and in coming up with a forecast, we

13 apply probabilities to the likelihood that they will

14 actually proceed.

15 I don't do that myself. I rely on the

16 advice of the non-utility generation people to come up

17 with the expected result of the various possibilities

18 that people propose in the responses to us, and the

19 non-utility generation people have their own sources of

20 information directly with the customers.

21 Q. I understand that the customers won't

22 necessarily all proceed with their projects; but do you

23 know what that total is that I asked you for?

24 A. No. I don't have that total right

25 with me, no.

1 Q. Could you provide it to us?

2 A. For the 1992 customer survey?

3 Q. The latest information you have;  
4 sure.

5 A. I will as long as it would not be  
6 presented in such a way as to violate confidentiality  
7 concerns; in other words, if there are not very many  
8 projects, I'm not going to give you the total.

9 Q. Sorry. Why is that?

10 A. Well, I think there's a practice that  
11 you certainly would not present information from  
12 confidential sources unless at least three items were  
13 on the list, so that one would not be able to identify  
14 individual components of the list. I'll have to make  
15 sure that, in fact, the way the numbers are presented,  
16 the confidentiality of the parties is preserved.

17 MR. B. CAMPBELL: Subject to ensuring  
18 that confidentiality, Mr. Chairman, could we have an  
19 undertaking number?

20 THE REGISTRAR: 940.3.

21 THE CHAIRMAN: That is 940.3, I believe.

22 ---UNDERTAKING NO. 940.3: Ontario Hydro to provide,  
23 subject to ensuring confidentiality, the  
24 total of natural, or self-generation  
25 projects that industrial customers say  
they are considering going ahead with,  
from the Annual 1992 Load Forecast Survey.

1 MR. SHEPHERD: Q. Now, Mr. Burke, I'm  
2 still in Exhibit 798, and I'm going to ask you to turn  
3 to Chart 4 of that. And, firstly, the pages aren't  
4 numbered in it.

5 THE CHAIRMAN: Tab what?

6 MR. SHEPHERD: This is tab 5, Mr.  
7 Chairman, of Exhibit 798. The witnesses only have that  
8 tab because they don't have the whole exhibit.

9 Q. And Chart 4 is only about half way  
10 through. Do you have that, Mr. Burke?

11 A. The one titled, "Kidd Creek 1991  
12 Energy Consumption"?

13 Q. Correct.

14 A. Yes.

15 Q. And there it says that the unit cost  
16 of electricity for Kidd Creek is 4.2 cents per  
17 kilowatthour. That's right at the low end of your  
18 spectrum of prices to customers, isn't it?

19 A. I don't know what all they've  
20 factored into that, and I don't offhand know whether  
21 this would include an interruptible rate contract and  
22 that sort of thing. It must be the average price they  
23 pay.

24 Q. In your range of charges per  
25 kilowatthour that you charge to industrial customers,

1 that's at the low end of the range, isn't it?

2 A. Let me check.

3 Well, looking at the retail energy price  
4 trends, large direct customers for 1991 on average paid  
5 4.4 cents per kilowatthour, so this is slightly below  
6 that.

7 Q. Sorry, 4.4?

8 A. That's what it says on page 35 of  
9 Attachment E of Exhibit 793 --

10 MR. SNELSON: A. 796.

11 MR. BURKE: A. 796.

12 Q. Okay. Well, I wonder if you could  
13 turn to page 2 of Attachment E then, and you see there  
14 where it says Industrial, bracket, Large Sector in that  
15 chart?

16 A. Yes.

17 Q. And it looks to me like it says 1991  
18 actual was 4.66 cents.

19 A. Yes. It's an average.

20 Q. Okay. Well, didn't you just say the  
21 average was 4.4 cents, or is that --

22 A. For large direct over 5,000  
23 kilowatthours a year.

24 Q. Isn't that the same as this?

25 A. No. If you see on page 35 there are



1 various categories. The number that you've found is  
2 under all large industrial.

3 Q. Oh, I see. So the actual number in  
4 '91 is 4.41 cents?

5 A. Yes. That's what I said a minute  
6 ago.

7 Q. Oh, sorry. So they are at the low  
8 end of the range then?

9 A. I don't think you can conclude that  
10 from this. I can tell you they're below average.  
11 There may be other industrial customers, larger volume,  
12 choosing to buy in off-peak hours more, and so on, that  
13 pay less.

14 Q. I assume if the average is 4.41 cents  
15 and Falconbridge is paying 4.2 cents, there are people  
16 paying more than 4.41 cents in the large direct  
17 category; correct?

18 A. Oh, that's true.

19 Q. Good. Yet, as I understand this  
20 filing with respect to Falconbridge, it's Exhibit 798,  
21 they appear to have done a cut of the economics of  
22 their cogeneration project and found -- they've termed  
23 it "sufficiently positive". I guess my question is:  
24 If Falconbridge, with a below average cost of  
25 electricity, gets a positive response to economics for



1 cogeneration, would that suggest to you as an expert  
2 that other customers who pay the average cost or pay  
3 higher than average cost are likely also to have fairly  
4 good economics for cogeneration?

5 [9:30 a.m.]

6 A. I think the current price of  
7 electricity has very little to do with the economics of  
8 cogeneration.

9 What it really turns on is what people  
10 expect over five, 10, 20 years to be paying for  
11 electricity and natural gas, and it really comes down  
12 to the judgments of the people doing the financial  
13 analysis in each case, what they expect the price of  
14 electricity to be.

15 I think that the economics must be pretty  
16 marginal at today's prices, and the issue must depend a  
17 lot on whether the expectations in the study that was  
18 done or is being done for Kidd Creek are considered  
19 realistic by the people who choose to finance this. I  
20 have no idea what is in that study, but the economics  
21 must be pretty marginal at today's prices.

22 Q. Why do you say that? You have  
23 analyzed the economics?

24 A. No, just that the -- I have only a  
25 broad or rough appreciation of what the relativity

1       between electricity and gas prices would have to be to  
2       make the project economic. But really, I'm judging by  
3       the fact that they had difficulty or seemed to have  
4       difficulty obtaining financing at the current time for  
5       this project. It is no more than that. The project  
6       has been on the books for some time as a possible  
7       cogeneration facility, and it hasn't proceeded so far.

8                   Q. Will you tell us about the difficulty  
9       in financing that you testified to?

10                  A. I have no information at all. I just  
11       read in the newspapers recently.

12                  Q. Your natural NUG forecast projects a  
13       penetration rate of about 3 per cent or so, right, over  
14       the next decade?

15                  A. Sorry, I don't know where that number  
16       comes from.

17                  Q. Well, you are projecting 300  
18       megawatts of additional natural NUGs; right? And what  
19       is your total industrial load in megawatts?

20                  A. I don't believe there is a number on  
21       the record for the total industrial load in megawatts.  
22       I think we have an energy forecast.

23                  Q. It is about a third of your energy?

24                  A. About, yes.

25                  Q. Your system is about a

1 30,000-megawatt system?

2 A. No. Current peak is around 22,000  
3 megawatts, and industrial load factor is in excess of  
4 the system average. I just don't think there is a  
5 number in the record for the industrial capacity in  
6 megawatts.

7 Q. But, Mr. Burke, I didn't ask you to  
8 look it up; I asked you what it was. Do you know what  
9 it is?

10 A. No, I don't have an estimate off the  
11 top of my head. No.

12 Q. Do you know what your estimated  
13 penetration rate is for natural NUGs over the next 10  
14 years?

15 A. Well, I look at it in energy terms,  
16 and we are adding about 3 terawatthours, and total  
17 industrial load is currently about -- let me just  
18 check...about around 40, 42 terawatthours. Looks like  
19 about 7 per cent of the energy.

20 Q. So about 7 per cent penetration rate  
21 then for load displacement?

22 A. In total.

23 Q. In total.

24 A. That does presume that all of the LD  
25 NUGs are I guess strictly industrial, they may be large

1 commercial customers potentially.

2 Q. Well, didn't you testify that you  
3 only have an industrial number?

4 A. Yes. What I meant by "industrial"  
5 is -- includes large service industries as well. In  
6 the industrial classification you have goods produced  
7 and you also have service industries. It can include  
8 hospitals and that sort of user of electricity as  
9 distinct from municipal utilities who are our  
10 customers.

11 Q. I am just confused about this  
12 industrial. This is the same industrial category we  
13 have talked about lots of times before; it is not new  
14 for this purpose?

15 A. The industrial sector for the load  
16 forecast is not new. When I have been talking about LD  
17 NUGs as being industrial as opposed to municipal  
18 utilities, 'industrial' in broad terms does allow the  
19 inclusion of some SICs that are in the commercial  
20 sector.

21 Q. Do you have an industrial category in  
22 your end use forecast?

23 A. Yes.

24 Q. In EEMO. Is it the same category  
25 that we are talking about here with NUGs?

1                   A. For the most part it is. But I guess  
2 I am just pointing out to you that the standard  
3 industrial classification includes commercial sector  
4 industries as well, and they may turn out to be load  
5 displacement NUG possibilities.

6                   We are dealing with slight variations of  
7 the term 'industrial'. Sometimes people call goods  
8 producing industries, some call it service industries;  
9 I in general am talking about industries when I am  
10 talking about LD NUGs.

11                  Q. But you are including things like  
12 hospitals?

13                  A. Yes, and universities.

14                  Q. Nowhere else in any of this stuff  
15 have we seen that included in the industrial category,  
16 have we?

17                  A. No, I admit this is a distinction I  
18 am making as far as it pertains to load displacement  
19 NUGs to distinguish it from municipal utilities. I  
20 said 'industrial use' and I wasn't confining myself to  
21 only goods producing industries in doing that.

22                  But it is not a large chunk in what would  
23 be defined in the commercial sector, but there are  
24 definitely some small load displacement NUG  
25 possibilities going ahead in some of the larger service



1 sector buildings.

2 Q. Of course, this projection that we  
3 are talking about, it is based on historical data;  
4 right?

5 A. Yes.

6 Q. Historical data is all industrial  
7 self-generation; correct?

8 A. I think that's correct, yes..

9 Q. So when you say that your forecast  
10 includes things other than industrial, other than that  
11 conventional industrial, how could it do that if it is  
12 based on data that doesn't include that? That is not  
13 right mathematically, is it?

14 A. Well, the, hmmm... I think if you  
15 check the data sources that the -- what we have done is  
16 we have used the industrial data, which is the only  
17 data available, and we have projected from it.

18 But the base amount of energy that we use  
19 in 1991 is an amount that has been calculated to be a  
20 realistic estimate - realistic? - our best estimate of  
21 the total amount of energy used in load displacement  
22 NUGs in Ontario, which is somewhat larger than the  
23 Statistics Canada estimate of energy in their data set.

24 But I'm not going to claim that that is  
25 because we have included some of these commercial



1 sector ones. It is just we find their numbers to be  
2 surprisingly small for the amount of energy generated  
3 by industry.

4 So for the base year, I believe it was  
5 1990, we produced our own estimate as the starting  
6 point for this analysis that we did, but the  
7 relationship which we wanted to get from the equation -  
8 that is, the various elasticities of how the amount of  
9 energy responds to changes in price - that was done  
10 purely with industrial data as Statistics Canada has  
11 it. You are quite right.

12 Q. And is it correct, Mr. Burke, that if  
13 your data set is one category, you cannot - without  
14 some additional analytic step - you cannot project into  
15 the future for a different data set; correct?

16 A. Well, it really comes down to making  
17 a judgment as to whether the nature of the cogeneration  
18 facilities, the economic decision is any different for  
19 a large hospital or an industrial site, and I don't  
20 think it is.

21 Clearly, in all cases there are  
22 site-specific considerations about the amount of  
23 cogeneration that can occur and all that sort of thing,  
24 but the broad economics of the cogeneration facility  
25 are similar, whether it happens to be in a commercial

1 building or an industrial plant.

2 Q. So I presume, therefore, that with  
3 that amendment your penetration rate, which you  
4 estimated at 7 per cent, is actually overstated?

5 A. That is why I made the qualifier. It  
6 is possible that some of that may not occur in the  
7 industrial sector per se as defined for the end use  
8 model.

9 Q. Okay. And, of course, you also have  
10 to adjust your penetration rate for the fact that you  
11 are expecting load growth; right?

12 A. Well, you are the one who introduced  
13 the penetration rate. I have just tried to tell you  
14 what the total current load in the industrial sector  
15 was and what the increase in energy associated with  
16 load displacement NUGs is and take a ratio for you.

17 But the concept is not one that I had  
18 introduced, and I am -- you know, wouldn't necessarily  
19 use it. I'm not sure what you want it for. So if  
20 there is a particular calculation you would like me to  
21 make I'll make it.

22 Q. Okay. Well, you do use the concept  
23 of penetration rate for fuel switching; correct?

24 A. We use the concept of penetration  
25 rates to look at the take-up of programs. We use the

1 concept of market share when we look at the share of  
2 fuels in markets driven by market forces.

3 I don't particularly use the concept of  
4 penetration rate as something that is the result of  
5 market forces acting to make choices, to -- as a result  
6 of choices made in response to market forces. That  
7 would be clear.

8 Q. You make estimates in your end-use  
9 forecast of the extent to which a particular decision  
10 like switching fuels will penetrate the marketplace;  
11 correct?

12 A. Yes. I call it a market share.

13 Q. Market share, okay. And what is that  
14 percentage for fuel switching in your current estimates  
15 over the same time frame that we are talking about  
16 NUGs?

17 A. I have market shares for the  
18 residential and commercial space heating market. I  
19 could look them up, but they are of the order of 20, 25  
20 per cent. It is a very different market.

21 Q. It is true, isn't it, that the  
22 influences on fuel switching are at least by analogy  
23 similar to the influences on self-generation; correct?

24 A. Only directionally. The difference,  
25 or the major difference is that you actually have to

1 generate electricity with natural gas, which has a  
2 major efficiency loss in conversion; whereas, the  
3 markets that we are looking at, the space heating  
4 markets, we are talking direct combustion of gas to  
5 produce heat in comparison to the use of electricity to  
6 produce heat. There is a major difference in the  
7 efficiency losses if you are talking about secondary  
8 energy.

9 Q. High efficiency cogeneration is what  
10 sort of efficiency level, on average? Let's say we are  
11 talking 5,000 heat rate. What sort of efficiency?

12 A. All right. You are going back and  
13 forth between load displacement NUGs and various forms  
14 of cogeneration.

15 Q. Isn't that what they are?

16 [9:45 a.m.]

17 A. Not always.

18 Q. The projects that are being proposed  
19 right now to self-generate, in almost every case they  
20 are cogeneration, aren't they, Mr. Burke?

21 A. There's a certain component of  
22 cogeneration in the project; yes. I don't know the  
23 specifics of these projects because no one is running  
24 around telling everybody what the specifics are, so I  
25 don't know what degree of cogeneration is in these

1 projects.

2 Q. Is there a major difference in  
3 efficiency between a gas furnace in a home and a  
4 high-efficiency cogeneration facility in a hospital or  
5 an industrial plant?

6 MR. SNELSON: A. I think there's a range  
7 of efficiencies in both cases. My gas furnace in my  
8 home is well over 90 per cent efficiency. Cogeneration  
9 efficiencies aren't typically that high.

10 Q. Although, in fact, in all of your  
11 material the assumption you use for gas efficiency is  
12 75 per cent; isn't it?

13 MR. BURKE: A. Well, which material?

14 Q. Well, it's right here. Throughout  
15 here we see all these efficiency adjusted figures.  
16 Those are your figures; right?

17 A. Yes.

18 Q. Okay. And that you use 75 per cent  
19 efficiency for that?

20 A. I'm not exactly sure. I thought it  
21 was even lower than that frankly, but they're just  
22 intended to be indicative. We have the unadjusted  
23 numbers, and we show some adjusted numbers. We give  
24 all of the efficiencies that are possible in the  
25 document.



1 Q. We were looking at Exhibit 798 in  
2 chart 4, and I'd like you to just look at the first two  
3 lines of that, which are -- this is Energy Consumption  
4 for 1991, apparently.

5 And the first line is electricity  
6 measured in kilowatthours and the next line is natural  
7 gas measured in cubic metres. And I am just going to  
8 ask you, there's a number at the end of each of those  
9 lines which is cost per gigajoule. Is it fair to say  
10 that that's the relative cost per unit energy expressed  
11 in constant terms of those two fuels? Is that what  
12 that concept is?

13 A. I'd have to look carefully to see --  
14 sorry.

15 I'd have to look carefully to see how  
16 they have calculated the ratio. There are many ways of  
17 doing that. I'm not sure, for instance, offhand  
18 whether they're using the equivalent energy... No?

19 Well, if you want a comment on that  
20 you're going to have to give me time to look at this  
21 table.

22 Q. The ratio of gross energy output --  
23 or sorry, I have to be careful here. The cost per unit  
24 energy for electricity is, in your own evidence,  
25 substantially higher than the cost per unit energy for



1 natural gas, correct, for most uses?

2 A. In input terms, yes. The question  
3 is which is the more efficient in output terms, and  
4 that's what it comes to in the end; in other words,  
5 electricity is a higher quality energy form and,  
6 therefore, may provide more service per input Btu than  
7 natural gas, but it can be that the costs of that may  
8 not outweigh the benefits.

9 Looking at the numbers here, the unit  
10 cost, the ratio of the unit cost of electricity and gas  
11 seem to be roughly the same as the cost per gigajoule  
12 at the end of the -- of the column, so I think what the  
13 cost per gigajoule is reflecting for the most part is  
14 simply the ratio of the unit costs.

15 Q. Sorry. Could you explain that?  
16 Maybe I just can't read very well today. It doesn't  
17 look like the ratio of unit cost is anything like the  
18 ratio of cost per gigajoule, but --

19 A. All right. Sorry, I take it back. I  
20 will have to study this table more to draw any  
21 conclusions from it. You're right. It's a  
22 coincidence.

23 Q. All right. Let's get out of this.

24 I'm going to ask you to look at page 2 of  
25 Exhibit 938. If you recall, we talked about that,

1       being a chart of your figures from Attachment E or  
2       Attachment C, rather.

3                       Do you have that, Mr. Burke?

4                       A.   Yes.

5                       Q.   Now, if you can just hold that there  
6       and go to Attachment E, page 51, and you see there's a  
7       list of projected real industrial electricity prices,  
8       right?

9                       A.   Yes.

10                      Q.   Now, I guess having seen this ski  
11       slope here of natural NUGs, I would have expected that  
12       if we plotted the shape of electricity prices, we'd get  
13       a similar shape, but if you look at page 3 of Exhibit  
14       938, you see the shape is quite different.

15                      Now, this is, as I understand it, because  
16       you project natural NUGs as a function of a combination  
17       of natural gas prices and electricity prices, correct?

18                      A.   Yes.

19                      Q.   So even though electricity prices go  
20       up and stay up, people will drop their production of  
21       self-generation because natural gas prices are going  
22       up?

23                      A.   That's what the equation suggests;  
24       yes.

25                      Q.   Well, that's what your projection

1 says, right?

2 A. Yes. That part of the projection is  
3 based on the equation.

4 Q. Okay. Once the customer has paid for  
5 the capital cost of a self-generation facility, they  
6 only have the fuel and the OM&A costs left, right?

7 A. Yes.

8 Q. That means that their cost of  
9 production of electricity from that facility is cheaper  
10 than before they built it; right? You have got some --

11 A. Yes. There's the -- once the  
12 capital cost is sunk, it -- it's not part of the  
13 ongoing cost of the facility.

14 Q. And, in fact, generally isn't it true  
15 that in order to amortize capital costs on that per  
16 unit basis, typically with any capital decision, you  
17 want to have as many units of production as possible to  
18 reduce the cost per unit; correct?

19 A. Yes.

20 Q. So wouldn't it be true in the case of  
21 a cogeneration facility that once it's built, in  
22 general the owner of it would want to produce as much  
23 as possible from it?

24 A. As long as his operating costs were  
25 below the cost he could buy an alternative source of

1 energy for.

2 Q. Absolutely. But if the  
3 self-generator has done an economic analysis and  
4 determined that with capital costs it's cheaper to  
5 self-generate than to buy electricity from you, isn't  
6 it true that once you take the capital costs out, you  
7 would have to have an awful big jump in natural gas to  
8 change that?

9 A. It depends what the expectations were  
10 in that study in the first place.

11 Q. Okay. Well, then, let's go to the  
12 model. I'm looking at page 104 of Attachment C. Well,  
13 I'm not yet, but I'm going to in a second.

14 And what you -- you call this model that  
15 you're using for this estimate a rational expectations  
16 model; correct?

17 A. A simple one, yes.

18 Q. And as I understand this, correct me  
19 if I am wrong, this model says the customers will  
20 self-generate based on their expectations of future  
21 prices, and those expectations will be rational in that  
22 they will be based on past price increases; is that  
23 correct?

24 A. What we are suggesting is that in  
25 order to proxy what people may feel are the future

1 prices of electricity and gas, we will look at recent  
2 past trends in prices and extrapolate those, not take  
3 into account any other future cost factors.

4 Now, whether that's strictly speaking  
5 rational from a, sort of the normal use of the word,  
6 that's for someone to judge. The use of the term  
7 "rational expectations model" is, to use the words  
8 together, rational expectations, it's what people can  
9 expect given the recent past. That's how economists  
10 use the term "rational expectations model", it's based  
11 on past information and a naive extrapolation of that  
12 into the future.

13 Q. I thought you were making a causal  
14 connection between past price increases and customers'  
15 decisions to self-generate. No causal connection?

16 A. We're making a causal connection  
17 between what -- it's not even a causal connection. We  
18 are inferring what customers will think future prices  
19 of electricity and gas are from the recent trends,  
20 rather than from what anyone else may say about the  
21 future price of those. In other words, we have a price  
22 forecast for gas that's rising after a year or two in  
23 the forecast period, but the recent trend has been that  
24 it's falling, so we're saying in the context of  
25 rational expectations modelling, the customer has every



1 reason to believe that gas prices will continue to  
2 fall. Electricity prices have been increasing, so  
3 people have perhaps every reason to expect, if they're  
4 extrapolating from the actual information they have,  
5 that electricity prices will continue to increase.

6 Now, neither of these in the long term is  
7 part of our forecast, but we're not expecting that  
8 customers will necessarily believe our forecast or act  
9 on it, we will expect them to have their own views.  
10 And when we try to come up with what those views may  
11 be, we have gone to this approach of rational  
12 expectations modelling which tries to find what they  
13 would think without us knowing what goes into their  
14 calculations just based on the trends in recent  
15 history.

16 Q. So you're talking about recent  
17 trends, but isn't it true that your model only looks at  
18 the increase from last year to this year in each price?

19 A. The model uses an expected price  
20 variable which comes out of an electricity price  
21 equation and an actual gas price equation.

22 Q. Yes.

23 A. And those equations are, I believe,  
24 auto-regressive, which means they are the weighted  
25 average of very -- several recent years' prices.



1 Q. Okay. I guess I don't -- is the  
2 equation not here anywhere?

3 A. It's quite possible it isn't. We  
4 intend to document the methodology used here in a  
5 report which is not available yet. It will include the  
6 equations used for price expectations for electricity  
7 and natural gas and how we came to those as opposed to  
8 some other.

9 Q. So all these equations in here that  
10 appear to be explanations of what you do and all use  
11 one-year price changes, that's not how you do it  
12 actually, right?

13 A. No -- sorry. No. Excuse me. We do  
14 give you equations here.

15 Q. Okay.

16 A. But the nature of these equations is  
17 that the... Yes. The coefficient estimate on the lag  
18 values is a function of many years' price changes.  
19 When we are forecasting, that relationship just is  
20 applied to the last year. I guess that's the  
21 distinction that I would make.

22 Q. I didn't understand any of that.  
23 Let's try again.

24 A. Well, I think you're trying to  
25 suggest that -- that -- well, I'm not sure what you're

1       trying for suggest. Maybe you had better try again.

2       (Laughter)

3       [10:00 a.m.]

4                       Q. I'm not sure I'm sure any more.

5       Okay. The equation is here. Which one is it?

6                       A. Well, they are the price expectation  
7       equations that are given about two-thirds of the way  
8       down page 105.

9                       Q. PELEC and PNGAS; right?

10                      A. Yes.

11                      Q. And each of those uses a one-year  
12       change variable; correct?

13                      A. Yes.

14                      Q. But then you are saying that the  
15       coefficient - that is, the number before the variable -  
16       has been established based on...what?

17                      A. Well, it has a whole time series of  
18       values for the relationship between electricity and  
19       previous prices and the lag price.

20                      Effectively, what I am saying is there is  
21       more than a single-period wait in the estimation. But  
22       when you forecast, yes, you are quite right, you apply  
23       that coefficient times the last value to get the next  
24       value. So it is very simple in that sense, yes.

25                      It just says -- but determining whether

1 it is 1.1 or 1.3 that was -- in the estimation process  
2 has effectively looked at how prices compound over  
3 time.

4 I don't think it is material to anything.  
5 For forecasting purposes, you are right, we are using  
6 the last value and multiplying it by a coefficient  
7 here. I just was reacting to something you said about  
8 we are only using one data point. We are not.

9 Q. No, I didn't say you are using one  
10 data point. I said in your future projections the  
11 relationship of self-generation is to last year's price  
12 change only. That's correct, isn't it?

13 A. Yes, that's correct. Yes.

14 Q. And all the stuff about the  
15 coefficient adjusting for it, that is not correct, is  
16 it? The coefficient does not adjust for that  
17 relationship, does it?

18 A. Well, now, you have lost me. I don't  
19 know which relationship any more.

20 Q. The relationship between the change  
21 in prices in one year and self-generation the next  
22 year, that is the relationship you have postulated in  
23 this equation; correct?

24 A. The equation we are looking at now is  
25 a relationship between past electricity prices and

1 current electricity prices.

2 Q. Correct. And then in your formula  
3 what you say is --

4 A. -- on page 106 now?

5 Q. Okay. Your formula says direct  
6 relationship between that and self-generation; correct?

7 A. That's correct, yes.

8 Q. So then there is a direct  
9 relationship between the first part - that is, your  
10 change in prices from one year to the next - and  
11 self-generation; correct?

12 A. Yes. Sorry, if that was -- I must  
13 have gone off track there, if that was all you were  
14 looking for.

15 Q. So from the point of view of this  
16 equation, if you show three years of dropping  
17 electricity prices and then a year of increasing  
18 electricity prices your equation will assume more  
19 self-generation, notwithstanding that the trend is  
20 generally down rather than up.

21 A. The equation operates as you  
22 described it, and it represents the best analysis we  
23 could come up with. We don't find significant  
24 relationships between the prices two or three years  
25 ago, so we didn't use them. I can only say that is

1 what this equation shows.

2 If you don't like the equation, that's  
3 fine. But that is the way it works. You have  
4 described that correctly. It is empirically the best  
5 equation we could find.

6 Q. And if Ontario Hydro announces, for  
7 example in this hearing or at the OEB or wherever,  
8 press release, that prices over the next three or four  
9 years are going to go up "X" per cent real, whatever it  
10 happens to be, this equation will not suggest that that  
11 will have any influence on self-generation, correct,  
12 because in fact it is not in there anywhere?

13 A. That's right. It is looking at -- it  
14 is saying that people are determining their views on  
15 the basis of the past.

16 Now, the reason we did that was because  
17 our forecasts are not in the same direction as the  
18 past, and we would get much less load displacement  
19 non-utility generation if we were to forecast this  
20 using our prices as opposed to expected prices.

21 We certainly aren't going to let the  
22 thing whipsaw and go the other way and get a perverse  
23 result out of this equation. The intent of this  
24 equation is to get a higher result for load  
25 displacement NUGs than we would get if people used our



1 prices as if they were theirs, their forecasts.

2 Q. All right. Let's move to a second  
3 area on this.

4 Below a certain threshold, let's say a  
5 threshold of combined electricity and natural gas  
6 prices unfavourable to self-generation, there is a  
7 certain point at which it simply isn't economic for  
8 anybody; isn't that right?

9 A. Well, yes. There is a certain point,  
10 and you also have to include on that spectrum the  
11 degree of cogeneration that is involved in the  
12 facility.

13 Q. Of course. Of course. But there is  
14 a threshold there somewhere, a threshold price, and you  
15 just can't cover your capital costs unless you have a  
16 certain price advantage of electricity over -- or of  
17 natural gas over electricity; right?

18 A. Yes.

19 Q. Okay. There is no threshold in this  
20 equation, is there?

21 A. No.

22 Q. You based this equation on data from  
23 1972 to 1992; correct?

24 A. I believe that's correct, yes.

25 Q. In which you looked at electricity



1 and natural gas prices and then fitted your function to  
2 actual self-generation during that period?

3 A. As estimated by Statistics Canada.

4 Q. Isn't it true that for much of that  
5 period the relative price of natural gas and  
6 electricity coupled with the capital cost of equipment  
7 made self-generation rarely viable; isn't that correct?

8 A. In the early '70s it was quite  
9 attractive. I can only say that load displacement  
10 non-utility generation facilities have been put in  
11 service throughout the period since 1972, not just in  
12 the early '70s. There was major facilities in the  
13 early '80s put in place.

14 Q. Will you take a look at page 20 of  
15 the load forecast, please? Do you have that?

16 A. Yes.

17 Q. Do you see the chart at the top of  
18 the page? If you ignore the fuel oil figure, which is  
19 the middle line, isn't it correct that the relationship  
20 between electricity prices and natural gas prices is  
21 quite different in your forecast period than in the  
22 last 20 years? Isn't that a fair conclusion?

23 A. Historically, we had a period of  
24 falling ratio between electricity to gas; that is, gas  
25 became more expensive.

1                   You can see the gas line peaking at '83  
2                   there, and then falling against a relatively flat  
3                   electricity line, and in the future we have a period in  
4                   which we project that gas will rise relative to  
5                   electricity.

6                   There is certainly precedent  
7                   historically, and, in fact, that is why the equation  
8                   fits fairly well, is that in the period beyond '83  
9                   when -- sorry, in the period around '83 when gas prices  
10                  were rising and electricity was fairly flat, production  
11                  from the facilities actually declined according to  
12                  Statistics Canada data and has subsequently picked up,  
13                  so that there is some tracking of the price of -- the  
14                  relative price movements. Otherwise, you wouldn't get  
15                  a good equation.

16                  Q. I look at that chart, Mr. Burke, and  
17                  it looks to me like -- it is almost like the line you  
18                  drew in the middle of the page distinguishing between  
19                  one period in which the prices weren't very far apart,  
20                  little bit but not too much, and your projected period  
21                  in which they are and continue to be throughout the  
22                  period quite aways apart; isn't that a fair --

23                  A. You are looking at absolute  
24                  differences now as opposed to trends, slopes?

25                  Q. Isn't absolute differences how

1 self-generators pay for their capital costs?

2 A. Absolute differences...? No, I --  
3 relative price differences. The ratio of prices are at  
4 least as important as the absolute difference.

5 MR. SNELSON: A. I think there is a  
6 caution you should perhaps bear in mind in looking at  
7 this figure, and that is that -- particularly when you  
8 start talking about absolute differences rather than  
9 just general trends, and that is, this is for the  
10 residential sector and what Mr. Burke's been talking  
11 about is primarily for the industrial sector.

12 And there are availabilities of different  
13 types of gas supply that aren't available to the  
14 residential customer through contracting arrangements  
15 and so on, and there are different proportions of  
16 distribution costs for both gas and electricity rolled  
17 into this. So I would think one would have to be a bit  
18 cautious about how far one went in judgments in respect  
19 particularly to absolute differentials rather than  
20 trends in this figure.

21 Q. We don't have a chart like this for  
22 industrial, do we, in any of your material?

23 MR. BURKE: A. I'll check Exhibit E. I  
24 wouldn't be surprised if there is one in Exhibit E.

25 Q. I looked for one, and I couldn't find

1 one, but maybe it was late at night. Maybe you could  
2 let us know later if you find one?

3 You mentioned the period of the early  
4 80s. Now, Mr. Burke, it is correct, isn't it, that  
5 during the period of the early '80s the cost of gas  
6 reached the point where the marginal fuel cost actually  
7 exceeded the cost of electricity; isn't that right?  
8 Once transportation and everything else was taken into  
9 account, it was actually more expensive than simply  
10 buying it from Hydro?

11 A. I really am not sure what you are  
12 referring to here. All the plots and stuff that we  
13 have got here show gas price below the price of  
14 electricity.

15 If you are asking what it would cost to  
16 cogenerate with that gas or generate from natural  
17 gas -- and certainly there were periods where you could  
18 not cover with most operating efficiencies the price of  
19 electricity using gas as a fuel for generation. I'm  
20 not quite sure what you are trying to get at.

21 Q. That's okay. No, that is exactly  
22 right.

23 Now, in the period of your forecast there  
24 is no period of time in which you expect that condition  
25 to occur, is there?

1 A. I think that it gets close, but it is  
2 certainly not like the period of the early '80s.

3 Q. The only period of time in your  
4 historical data, the data set on which you fitted this  
5 equation in which self-generation declined, was in that  
6 period that you have just described; right?

7 A. Except for the recession in '75. But  
8 yes.

9 Q. And you don't expect conditions like  
10 that to take place again. Isn't that what you have  
11 just said?

12 This sounds very obtuse, I know, but I  
13 guess, I don't understand how you can expect  
14 self-generation to decline unless the same thing  
15 happens; that is, it becomes marginally more expensive  
16 to use the gas than to use the electricity. And you  
17 are not projecting that, so how can it decline?

18 A. Well, if we got into an engineering  
19 analysis of cogeneration, then I think the principles  
20 that you are talking about have some validity.

21 I used this equation because it captured  
22 the relative price changes and how they affected demand  
23 historically. And I agree, there is some uncertainty  
24 whether in future people will in fact, at the price  
25 levels that we are looking at, use less electricity



1       than -- generate less electricity with their facilities  
2       than at the maximum point in 1998.

3               It is not necessarily the new facilities  
4       that are going to -- you know, the equation does not  
5       imply that it is the new facilities that are being  
6       installed that will reduce their capacity. It could  
7       be -- reduce their generation -- it could be older  
8       natural gas load displacement NUG facilities that are  
9       less efficient, that wind down their generation.

10              I can't be site-specific or  
11       engineering-specific with this equation. There are  
12       circumstances in which the results of the equation  
13       could hold.

14              I would not have been able to fit an  
15       equation -- I could not ever have had an equation which  
16       told me the response at price levels which we have not  
17       had. So that is a bit of a conundrum. This was the  
18       best equation that we could find.

19              There are circumstances one could  
20       postulate where it would be attractive to customers to  
21       buy from Hydro, perhaps in off-peak periods, but --  
22       sorry, yes, in peak -- well, whichever, in off-peak  
23       periods and not in peak periods, various ways that  
24       people might respond to shifting relative prices which  
25       might make their situation advantageous.



1 I am simply -- for something which I  
2 think we would all agree is rather difficult to  
3 project, we have come up with what we believe to be a  
4 plausible equation. There is a degree of uncertainty  
5 certainly.

6 What we are talking about is three  
7 terawatthours in the year 2015, and I will admit, there  
8 is a degree of uncertainty how people will respond when  
9 prices get into that range.

10 The sort of price ratio we do have in the  
11 industrial sector by 2015 is about 3.2 or 3.3 to 1 for  
12 electricity to gas. And if there was no cogeneration  
13 involved in the facility, it would not be economic to  
14 run those plants. But it depends to what degree there  
15 is cogeneration involved in these facilities and are  
16 there some amongst the 10 terawatthours who have  
17 relatively little cogeneration benefit out of their  
18 facility. It's -- we're on the margin, and I agree,  
19 it's uncertain.

20 [10:20 a.m.]

21 Q. It's reasonable to anticipate that  
22 the certainties surrounding this projection could be  
23 hundreds, perhaps even thousands, of megawatts; is that  
24 conceivable?

25 A. Thousands I don't believe to be

1 conceivable, no. In the sense of the sort of ground  
2 rules that this equation purports to project into  
3 where -- I'm not trying to deal with a totally  
4 different universe here, but when you look at the sites  
5 that offer cogeneration possibilities and their  
6 economics and so on, none of the numbers I have been  
7 told get into thousands of megawatts. There are  
8 hundreds. Well, we've got 300 here, and, yes, there  
9 could be more load displacement non-utility generation.

10 But, again, as I understand it, the  
11 economics of the incremental facilities largely depend  
12 on where the direction of future prices actually go or  
13 where people they think they will go, not on current  
14 prices, or we perhaps would have seen more  
15 cogeneration -- more of these facilities already.

16 Q. The third concern about your equation  
17 is one that you've alluded to yourself, that is, that  
18 it deals only with industrial self-generation. I  
19 understand that industrial self-generation is slightly  
20 different in this context. That's fine. But it's  
21 true, isn't it, that with increases in electricity  
22 prices for your commercial customers, and even some of  
23 your residential customers, it's now approaching the  
24 point where it is economic for them to self-generate;  
25 isn't that correct?

1                   A. I'm really not aware of that. I  
2 wouldn't be able to speculate. I think what I said was  
3 that in -- there are many commercial facilities that  
4 have properties similar to industrial plants, and I  
5 have an understanding of the options there, but if  
6 you're talking about individual households and so on,  
7 I'm not aware of the economics of generating power  
8 being attractive at that small a scale.

9                   Q. Office buildings?

10                  A. I really wouldn't wish to get into  
11 exactly at what point the plants become cost effective,  
12 what size.

13                  Q. Well, if you're going to estimate  
14 self-generation, you sort of have to know that, don't  
15 you?

16                  A. Yes. I've relied on the advice of  
17 the experts and the non-utility generation people in  
18 the Non-Utility Generation division, and they have not  
19 been suggesting that I include that sort of number in  
20 my projection.

21                  Q. So with the exception of a small  
22 amount of hospitals and universities, your current  
23 projection is that the amount of self-generation in the  
24 commercial and residential sectors for the next 25  
25 years will be zero; is that correct? That's what your

1 projection says.

2 A. That's what the projection says; yes.

3 Q. I know I'm mixing apples and oranges  
4 here, but isn't the City of Toronto project currently  
5 proposed to do district heating and local generation?  
6 Isn't that commercial sector? I mean, if it were a  
7 private sector person doing it, it would be in the  
8 commercial sector, right, it's office buildings?

9 A. Yes. I think that -- yes, that's a  
10 district heating scheme.

11 Q. Okay.

12 A. That's more than a building. That is  
13 a series of buildings, it is akin to a university in  
14 scope or probably larger.

15 Q. Okay. But what you have in your  
16 forecast for that is zero, right? You don't have it in  
17 the MUGs category and you don't have it in the NUGs  
18 category, do you?

19 A. That's correct.

20 Q. In 1990, natural thermal NUGs reduced  
21 annual energy by about 4-1/2 per cent, is that about  
22 right, just from the -- 4-1/2 per cent of total basic  
23 load. Am I in the right range there?

24 A. I'm just checking the numbers here.

25 I've got about 6-1/2 terawatthours out of

1 the 140 on the system; yes.

2 Q. Okay. And you're expecting that  
3 category to increase to about 6 per cent of basic load  
4 by its peak, right, by 1998, that sort of range?

5 A. Yes.

6 Q. And you're also projecting that by  
7 2015 that will have dropped to about 2.8 per cent of  
8 basic load, correct?

9 A. That's what's in the projection, yes.

10 Q. So relatively speaking, that less  
11 self-generation than today by a substantial margin  
12 notwithstanding higher real electricity prices and a  
13 bigger difference between electricity and gas prices;  
14 is that correct?

15 A. The ratio of electricity to gas  
16 prices will be -- is projected to be lower beyond about  
17 the year 2000 than it is today.

18 Q. Dollar difference is bigger, though?

19 A. The dollar difference may be bigger;  
20 yes.

21 Q. Okay.

22 A. But the ratio is smaller.

23 Q. You will, I know, be disappointed  
24 with this, but I want to leave the load forecast and go  
25 to Attachment D, which is system incremental cost. So



1       whose turn is it?

2                       Is this you, Mr. Snelson?

3                       MR. SNELSON: A. You can start with me.

4       I may have to defer some questions to other panel  
5       members.

6                       Q. Fine. Okay. Attachment D of Exhibit  
7       796, that's your latest set of system incremental  
8       costs, Mr. Snelson?

9                       A. Yes.

10                      Q. If you go to the first page of that,  
11       under the second heading Scope, it says that this  
12       includes capital changes up to October 19th. Now, I  
13       presume that, therefore, these system incremental costs  
14       do not include the closure of Lakeview, termination of  
15       the Manitoba deal, or any of the other changes since  
16       October 19th; is that correct?

17                      A. It doesn't include changes since  
18       October the 19th. Closure of two units at Lakeview  
19       would have been, but the other two units would not.

20                      Q. And this assumes Manitoba's in?

21                      A. Yes. I believe... I believe it  
22       assumes Manitoba is deferred by five years.

23                      Q. If you would go to page 12 of the  
24       report, please. Rather than just traipse through the  
25       report, I just want to look at the genesis of some of



1 the information on which this report has been prepared.  
2 This list here under 8.0, Data Source and Assumptions,  
3 this is a list of where you got the data and what it's  
4 currency is, right?

5 A. Yes.

6 Q. And so, for example, it's based on  
7 the 1991 load forecast, correct?

8 A. It lists the load forecasts. It  
9 depends upon which includes a September '92 update to  
10 the short-term load forecast.

11 Q. Okay. But it doesn't include the new  
12 load forecast that we've just been discussing at length  
13 with Mr. Burke, does it?

14 A. It does not include the December '92  
15 load forecast; no, sir.

16 Q. I'm just looking for a reference  
17 here. Just give me a sec.

18 Okay. Will you turn to the previous  
19 page, page 11, and under No. A it says:

20 Values in this prediction are sensitive  
21 to variations in assumptions pertaining  
22 to forecasted load growth and should not  
23 be used for analysis where load growth is  
24 significantly different from those used  
25 in the preparation of this prediction.

1       So I assume, therefore, that given the fact that you  
2       have a new, and by your own evidence, a quite different  
3       load forecast, doesn't that mean that you shouldn't be  
4       using these SICs any more?

5                   A. No, I don't believe so.

6                   Q. Okay. And why is that?

7                   A. The changes in the load forecast in  
8       the long run are not as large, are not all that large;  
9       and you've had the evidence on that from Mr. Burke.  
10      And in addition, the issue of this set of system  
11      incremental values was delayed until the magnitude of  
12      the likely change in the December '92 load forecast was  
13      known, and the people who prepare this considered it  
14      close enough to issue it for use in the organization.

15                  Q. Okay. The next item here is  
16      Corporate Financial Discount Rate. Now, that hasn't  
17      been updated since this September, right? It's the  
18      same number that you're using now?

19                  Still on page 12 here in this list of  
20      assumptions.

21                  A. I see the assumption; yes. And what  
22      was your question? I'm sorry.

23                  Q. The question is: This says September  
24      '92, that hasn't changed since then, has it?

25                  A. We're not aware of a change.

1 Q. Just looking at your capital  
2 expenditures here under the heading Thermal Integration  
3 and under the heading Power System Planning, now, the  
4 data from those, of course, has been substantially  
5 revised since those various documents that are listed  
6 there; is that correct?

7 A. We're looking at the Power System  
8 Planning category?

9 Q. I'm looking at the two categories,  
10 Thermal Integration and Services which appears to have  
11 all the fossil stuff in it and Power System Planning,  
12 which appears to have all the nuclear stuff in it.

13 A. Yes.

14 Q. And, I guess -- feel free to correct  
15 me if I am wrong, but it appears that you're using a  
16 report from earlier this year for nuclear and a report  
17 from 1989, or two reports from 1989 for fossil; there  
18 have been some pretty considerable changes in those  
19 categories of data since then, haven't there?

20 A. Well, I believe that they will have  
21 been adjusted for normal changes in escalation rates in  
22 such data. As regards the underlying data, I don't  
23 know of significant change since Panels 8 and 9 gave  
24 their evidence here; and I believe these documents were  
25 the base for Panels 8 and 9 as well.

1 Q. Fine. There's a document listed  
2 here, Nuclear Option Review 1992. Do we know that in  
3 this hearing under another name?

4 MR. DALZIEL: A. I think in Panel 9 it  
5 may have been an attachment to an interrogatory, but  
6 there's a document that was called Preliminary Nuclear  
7 Option Review. I think it had "preliminary" in the  
8 title.

9 Q. And it's still preliminary, same  
10 document; is that right?

11 A. That's being referred to here?

12 Q. Yes.

13 A. I'm not sure.

14 Q. I wonder if you could -- if this  
15 document, Nuclear Option Review has not been filed in  
16 this hearing, I wonder if you could undertake to file  
17 it; and if it has been filed, could you just tell us  
18 what document it refers to?

19 We couldn't find that, a document with  
20 that name, but if it refers to another document,  
21 perhaps you could let us know.

22 A. We can do that.

23 THE CHAIRMAN: That will be Undertaking  
24 No. 940.4.

25 THE REGISTRAR: No. 4, yes.

1     ---UNDERTAKING NO. 940.4: Ontario Hydro to undertake  
2                   to file the document, Nuclear Option  
3                   Review, and, if it has been filed,  
                 ascertain what document it refers to.

4                   MR. SHEPHERD: Q. You also have a report  
5     here listed as -- this is under Power System Plannings  
6     again, Transmission Planning, and it says, Transmission  
7     Costs 1991/1992 updates. Is that -- is that some sort  
8     of report that we've seen here?

9                   MR. SNELSON: A. These sources aren't  
10    necessarily reports. They're sources of information  
11    which may exist in a variety of forms.

12                  Q. I understand. Is this one a report?

13                  A. Not to our knowledge.

14                  Q. Okay. Just going on a little farther  
15    down to this fifth last line, it says: Forecast of  
16    Committed Demand Management, October 1992. That is a  
17    report, right?

18                  A. Again, we're not necessarily familiar  
19    with all the data sources; and, to our knowledge, we  
20    don't know of that being a report.

21                  Q. Well, Mr. Shalaby, you're in charge  
22    of that section, aren't you? You're in charge of that  
23    area of the utility?

24                  MR. SHALABY: A. In the Planning  
25    Department, yes.



1 Q. Okay. Are you familiar with that  
2 report, Forecast of Committed Demand Management,  
3 October 1992?

4 A. No.

5 Q. You've never heard of it?

6 A. Not that it's a report, no, I  
7 haven't.

8 Q. Okay. We don't have in this package  
9 a Forecast of Committed Demand Management, do we?

10 A. What is the question again? I'm  
11 sorry.

12 Q. We don't have in this package,  
13 Exhibit 796 and friends, a Forecast of Committed Demand  
14 Management, do we?

15 A. The table opposite has the complement  
16 to that which is the Uncommitted Demand Management,  
17 which is what matters for the calculation of  
18 incremental costs.

19 Q. Okay. But that's not what I'm  
20 asking.

21 A. The answer to what you're asking is  
22 yes.

23 Q. Yes, we do have it, or, yes, we don't  
24 have it?

25 A. Yes, we don't have it.



1 Q. Okay. Can you provide it then?

2 A. Yes.

3 Q. Your Forecast of Committed Demand  
4 Management?

5 A. Sure.

6 Q. Thank you.

7 THE CHAIRMAN: That will be Undertaking  
8 No. 5.

9 THE REGISTRAR: 5.

10 ---UNDERTAKING NO. 940.5: Ontario Hydro undertakes to  
11 provide the report, Forecast of Committed  
Demand Management, October 1992.

12 MR. SHEPHERD: Q. All right. You also  
13 have here under non-utility generation in-service and  
14 committed projects. Now, I take it that is the same as  
15 Attachment F in Exhibit 796; is that correct?

16 [10:40 a.m.]

17 MR. SHALABY: A. I would expect so, but  
18 as I say, I haven't examined all the data sources for  
19 this.

20 MR. SHEPHERD: Mr. Chairman, I am getting  
21 into a new area that might take a few minutes, I wonder  
22 if this would be an appropriate time to break?

23 THE CHAIRMAN: We will break now for 15  
24 minutes.

25 THE REGISTRAR: Please come to order.

1 This hearing will recess for 15 minutes.

2 ---Recess at 10:41 a.m.

3 ---On resuming at 11:00 a.m.

4 THE CHAIRMAN: Please be seated.

5 Mr. Shepherd?

6 MR. SHEPHERD: Thank you, Mr. Chairman.

7 Q. Mr. Snelson, we were talking about  
8 exhibit -- sorry, Attachment D of Exhibit 796. And on  
9 page 12 there is a chart of uncommitted demand  
10 management and NUGs. And you use that uncommitted  
11 total to calculate project appraisal avoided costs;  
12 right?

13 MR. SNELSON: A. The uncommitted demand  
14 management and NUGs and hydraulic capacity is the  
15 difference between the two cases that are used to  
16 estimate project appraisal system incremental costs.

17 Q. So the answer to my question is  
18 "yes"?

19 A. That is part of the difference  
20 between the two cases, yes. The hydraulic is  
21 additional.

22 Q. Can you confirm that relatively small  
23 changes to these numbers, changes in the order of 50 or  
24 100 megawatts could have substantial impacts on project  
25 appraisal avoided costs?

1 A. No.

2 Q. That's not the case?

3 A. System incremental costs are used for  
4 values up to a few hundred megawatts, and there would  
5 be some sensitivity, of course, but I don't believe it  
6 would be large for the order of 50 megawatts.

7 Q. It's true, isn't it, that the smaller  
8 you're uncommitted component, generally speaking, the  
9 lower the project appraisal avoided costs; is that  
10 generally true?

11 A. It depends which side of the equation  
12 is being kept constant.

13 Q. I don't understand your answer. Try  
14 again.

15 A. Well, is this a smaller uncommitted  
16 demand management being taken off the same basic load  
17 forecast or is it a smaller uncommitted demand  
18 management which is additional to the primary load  
19 forecast? And I think we get different answers  
20 according to which of those you assume.

21 Q. Completely lost. Let's try this  
22 again.

23 We've been through in Panel 3 at great  
24 length how you calculate project appraisal avoided  
25 costs. You do a plan with and without this uncommitted

1 component; right?

2 A. Yes.

3 Q. And you average the two costs?

4 A. Yes.

5 Q. Okay. And if the uncommitted  
6 component, that difference between those two plans you  
7 model - right? - is lower, is it not generally true  
8 that your project appraisal avoided costs are lower?

9 A. The project appraisal costs will be  
10 closer to the planning avoided costs, and if the data  
11 for the planning avoided costs has been kept constant,  
12 then the project avoided costs will be lower.

13 Q. Thank you. I'm just looking at this  
14 table on page 12 and it has a total of 2,029 megawatts  
15 of committed demand management and NUGs at present;  
16 right? Or, sorry, 1995, I guess.

17 A. Yes. If we're going to discuss this  
18 table, I would like to point out an inconsistency  
19 between this table and the paragraph that precedes it.

20 Q. Good.

21 A. In that the paragraph precedes it  
22 indicates that these values should be used for up to  
23 the amounts of demand management in the December '92  
24 long-term load forecast.

25 Q. Yes?

1 A. But it also implies that the figures  
2 that should be used for "up to" are in the table.

3 Q. Sorry, up to what?

4 A. Well, you see, if you read the first  
5 sentence, it says: Incremental system values for  
6 project appraisal are applicable for the  
7 assessment of uncommitted amounts of  
8 demand and supply side options as  
9 summarized below.

10 And as I read that, the "summarized below" is the  
11 table.

12 Q. Yes.

13 A. And it then later says that:

14 In the case of demand managements, it  
15 should be used for amounts over and above  
16 those included in the December '92 load  
17 forecast.

18 Q. Yes.

19 A. And those two statements are  
20 inconsistent.

21 Q. And which is right?

22 A. The intention is that these system  
23 incremental costs should be used for up to the amounts  
24 of demand management included in the December '92  
25 long-term load forecast.



1 Q. So it's not amounts over and above  
2 those in that forecast, it's amounts up to the amounts  
3 in those forecasts?

4 A. Well, it says: Incremental system  
5 values for planning are appropriate for amounts over  
6 and above those included in the December '92 load  
7 forecast--

8 Q. Oh I see. That's right.

9 A. --and by implication project  
10 appraisal values are for use up to those values.

11 Q. So the first two lines, then, we just  
12 ignore? They're wrong?

13 A. They are incorrect.

14 Q. Great. Glad we got that cleared up.

15 The 2,029 committed megawatts, that's  
16 what you have committed today; right?

17 It's the same throughout the chart, so I  
18 assume you have it now.

19 A. It's committed as of decisions that  
20 have been made at this time, yes.

21 Q. Okay. So can you break that down  
22 between DSM and NUGs for us?

23 A. I think that's essentially the  
24 undertaking that Mr. Shalaby gave you. You asked for  
25 uncommitted non-utility -- sorry, committed demand

1 management, and I believe Mr. Shalaby gave you that  
2 undertaking.

3 Q. Okay. So you don't know the NUG  
4 committed number?

5 A. I have indicated that to my -- as far  
6 as I know, it is close to the values that are in  
7 attachment F.

8 THE CHAIRMAN: Just so I'm clear, would  
9 the total committed megawatts include committed demand  
10 management committed NUGs, does it also include  
11 hydraulic or not?

12 MR. SNELSON: It should do. I'm not sure  
13 whether there is anything in there to actually include.

14 THE CHAIRMAN: Right.

15 MR. SHEPHERD: Q. You shouldn't have any  
16 committed hydraulic; right? Logically?

17 MR. SNELSON: A. We shouldn't have any  
18 committed hydraulic?

19 Q. Since you're asking for approval for  
20 your hydraulic here, presumably you don't have any  
21 committed yet.

22 A. Well, there may be some hydraulic  
23 improvements that are committed that are outside of  
24 what we're looking at. For instance, Big Chute.

25 Q. Hmmm. Okay. The committed NUGs, I

1 just want --

2 THE CHAIRMAN: Well, except for that, you  
3 could take the table F and the 2,029 and from that  
4 derive substantially what the committed demand  
5 management was?

6 MR. SNELSON: You should be able to do  
7 that, yes.

8 MR. SHEPHERD: Q. So in table F, then,  
9 you have this in service and committed, and that looks  
10 like it totals about 800 megawatts, give or take; so I  
11 assume that the rest of this committed megawatts is  
12 demand management or hydraulic; right?

13 MR. SNELSON: A. Yes.

14 Q. Good. Now, I guess what I don't  
15 understand is you got, to the year 2000, 227 megawatts  
16 of uncommitted NUGs; right?

17 A. See, I have just realized something  
18 which may, in fact, make this arithmetic we're going  
19 through inappropriate. And that is with respect to  
20 the -- assuming that we can deal only with purchase  
21 non-utility generation, and I would expect  
22 program-driven load displacement nonutility generation  
23 to be additional to that.

24 Q. That's fine. That's all you wanted  
25 to clarify? That's fine.

1 A. Well, that is the, you know, I  
2 haven't been through precisely this way of working  
3 things through, and it appears as though it should work  
4 with that qualifier.

5 Q. The program-driven load displacement  
6 is what, 71 megawatts or something like that?

7 MR. BURKE: A. That sounds right.

8 Q. So if we were within 71 megawatts we  
9 should be happy here; right?

10 MR. SNELSON: A. Yes.

11 Q. So we have about 800 megawatts of  
12 committed in this chart on page 12, and we have 227  
13 megawatts of uncommitted, which is 1,027 megawatts  
14 totalled to the year 2000.

15 Now, I guess I don't understand how that  
16 relates to 2,384 megawatts. That's a lot bigger  
17 difference than 71 megawatts; isn't it?

18 A. Yes, it is a larger difference and I  
19 don't know the reason why.

20 Q. Could you find that out for me?

21 A. Yes. We'll endeavor to do so.

22 THE CHAIRMAN: Is that undertaking  
23 number...?

24 THE REGISTRAR: Point six.

25 THE CHAIRMAN: Thank you.

1       ---UNDERTAKING NO. 940.6: Ontario Hydro undertakes to  
2                               determine why, with 800 megawatts of  
3                               committed and 227 megawatts of  
4                               uncommitted which is 1,027 megawatts  
                              totalled to the year 2000 how that  
                              relates to 2,384 megawatts - being a  
                              greater difference than 71 megawatts.

5  
6                       MR. SHEPHERD: Q. Now, we talked about  
7       the sensitivity of project appraisal avoided costs to  
8       variations in the uncommitted assumptions. If you're  
9       really out 1300 megawatts, is it sensitive to that sort  
10      of range?

11                     I asked: Is it sensitive to small changes  
12      like 50 or 100 megawatts? And you said: No, not  
13      really.

14                     What about big changes like 1300  
15      megawatts; is it sensitive to that?

16                     A. Potentially it's sensitive to that,  
17      yes.

18                     Q. Great.

19                     Now, can you go back to page 2 of  
20      Attachment D, please?

21                     And as you'll see in the third paragraph  
22      there, Mr. Snelson, it says:

23                     You no longer - I think it's right -  
24                     you no longer give interarea transmission  
25                     credits for NUG projects or DSM programs



1 unless they provide capacity in the  
2 Toronto area.

3 Is that basically correct?

4 A. Yes.

5 Q. So that would reduce the avoided  
6 costs for most NUG projects and most DSM programs,  
7 wouldn't it?

8 A. Due to that factor alone, yes.

9 Q. Of course that methodological change  
10 was before you had cancelled the Manitoba contract;  
11 right?

12 A. It was about the same time.

13 Q. Well, my question is one of  
14 chronology. Does this methodological change take into  
15 account the cancellation of the Manitoba transmission  
16 or does it not?

17 A. I have said that the data for these  
18 system incremental costs is based on an assumption of a  
19 five-year delay to the Manitoba Purchase contract.

20 Q. Great. So all that transmission not  
21 being built in Northern Ontario, when you have that  
22 situation, is it fair to assume that demand management  
23 and NUGs, new generation, new load reductions, could  
24 now once again have a significant effect on  
25 transmission requirements in Northern Ontario, now that

1       you're not going to have that big line any more?

2                   A. The big line we're talking about is  
3       the Manitoba interconnection --

4                   Q. Yes.

5                   A. There will be some adjustments to the  
6       impacts of demand management and NUGs on the  
7       transmission plan, yes.

8                   Q. But what I'm getting at here is that  
9       when you told us in Panel 7 that there would be  
10      significant transmission needs if you didn't build  
11      Manitoba -- you didn't build the Manitoba transmission.  
12      And, in fact, you said those needs were so big, it was  
13      almost like you were getting the transmission for free.

14                   So presumanbly you now have to build --

15                   THE CHAIRMAN: I don't know whether he  
16      actually said that. Did you say that, Mr. Snelson?

17                   MR. SNELSON: Well, first of all, he was  
18      referring to Panel 7 and I wasn't on Panel 7.

19                   THE CHAIRMAN: I thought you were on  
20      Panel 7. Am I wrong about that?

21                   MR. SNELSON: Panel 7, I believe, was  
22      Manitoba and Transmission; and Mr. Huggins and Mr.  
23      Macedo were on that panel.

24                   THE CHAIRMAN: You weren't on that panel?

25                   MR. SNELSON: I was not on that --

1 MR. SHEPHERD: I thought he was, too.

2 (Laughter)

3 Q. I withdraw the "almost for free".

4 But without the contract, obviously you  
5 have those needs again, and demand management in NUGs  
6 could affect those needs, could delay them or adjust  
7 for them, right, and it would have value; isn't that  
8 correct?

9 MR. SNELSON: A. It can affect the needs  
10 for transmission. Whether that causes it to be a  
11 situation where demand management has value in the  
12 sense that it reduces them rather than having a cost in  
13 the sense that it increases them, now that's something  
14 that would have to be evaluated.

15 Q. All right. And so, in fact, your  
16 current policy then is that you give transmission  
17 credits if load is -- the load balance is improved in  
18 the GTA, but, other than that, you have to do an  
19 individual assessment of the actual transmission  
20 savings associated with the project; right?

21 A. It says on Panel 2 -- on page 2 of  
22 this attachment, that's attachment D:

23 Options with impact on areas outside  
24 the greater Toronto area may be viewed on  
25 a project-by-project basis.

1 So the answer to your question, I believe, is yes.

2 Q. Good. Now, one of the effects of  
3 that is that the cumulative impact of a number of  
4 projects would never be caught in that analysis, would  
5 it?

6 If a project doesn't defer or affect a  
7 transmission requirement by itself, it will get no  
8 transmission credit; correct?

9 A. That would depend on how the  
10 individual project-by-project analyses were done.

11 It's quite possible to attribute a share  
12 of a change in a transmission plan to individual  
13 components, so as you don't avoid the situation of  
14 saying that up to some limit they have no effect and  
15 then the last small one has a very large effect. So  
16 there are ways of dealing with that.

17 Q. There are ways, I agree with you.  
18 But that's not how you do it, in fact, is it?

19 A. Well, I believe that this statement  
20 here is a direct consequence of the information that  
21 Mr. Macedo discussed on Panel 7, and that this is a  
22 step along the path that he indicated of trying to be  
23 more location specific in giving transmission credits.

24 Q. If you take a look further down page  
25 2 of this report, you see under 3.1 a reference to the

1 fact that your credit capacity or work capacity is  
2 available at winter peak, and this is something we have  
3 discussed before and I don't intend to go through it  
4 again.

5 As I understood it from Panel 3, both you  
6 and Mr. Shalaby were on, I believe, Mr. Snelson?

7 A. Yes.

8 Q. And Panel 8, I got the impression  
9 that Hydro back then, that was a long time ago, was  
10 reviewing whether summer capacity should have some  
11 credit. Capacity available at summer peak should have  
12 some credit.

13 And I guess my question is: What is the  
14 status of that review of the policy? Has it changed?  
15 Is it still under review?

16 A. I don't know of any changes in that  
17 policy in the last few months.

18 Q. Mr. Shalaby, this is you in Panel 3,  
19 page 6909. If you wish to get it, feel free.

20 I can show you this copy of the  
21 transcript if you would like, if it's easier for you.  
22 Do you want to see that?

23 [11:23 a.m.]

24 It is the bottom of page 6909 where you  
25 say, Mr. Shalaby:



1                   We are considering whether part of  
2                   the incremental power cost should be  
3                   ascribed to summer peak, and there are  
4                   two reasons why we are looking at that.  
5                   One is because of the fairly high air  
6                   conditioning loads that we have  
7                   experienced and the other is because of  
8                   of the relatively large maintenance  
9                   requirements that we have experienced.

10                  While that is not forecast to be the  
11                  situation over the long term in the  
12                  future, it has been the actual experience  
13                  over the last few years. So that causes  
14                  us to have another look at it.

15                  Mr. Snelson obviously is not familiar  
16                  with it. Do you recall what has happened to this  
17                  process that you have described here in Panel 3?

18                  MR. SHALABY: A. I don't have a  
19                  definitive knowledge of in what way the summer credits  
20                  have shifted. I don't know that.

21                  Q. Okay. Mr. Snelson, back to you.

22                  Take a look at page 3 of this report,  
23                  which has a discussion here of - I think it does - of  
24                  the value of short-term capacity.

25                  Do you see at the top here it says: The

1 retirement of two units at Lennox TGS, for example, is  
2 assumed to be the marginal action in the short term for  
3 planning purposes. That is the short term capacity  
4 number; right?

5 MR. SNELSON: A. Yes. And that  
6 statement is not strictly accurate. It should read:  
7 the mothballing of two units at Lennox.

8 Q. Mothballing is a lot cheaper than  
9 retiring, isn't it?

10 A. No, I think the distinction here is  
11 that -- it is the temporary removal from service rather  
12 than the permanent removal from service.

13 Q. The annual marginal cost of  
14 mothballing is substantially lower than the annual  
15 marginal cost of retiring a unit before it is due;  
16 isn't that correct?

17 A. I would not expect that to be the  
18 case.

19 Q. Okay. Anyway, we are still going to  
20 do something with Lennox; right? And I presumed that  
21 your system incremental costs were calculated using  
22 mothballing, not using retirement as the assumption.

23 A. That is why we made the correction.

24 Q. Okay. Good. So now I am going to  
25 ask you to look at Exhibit 592, which I think I asked

1 your counsel to have available to you on Thursday, and  
2 that is the March system incremental costs. And if you  
3 take a look at the bottom of page 2 of that one it  
4 says -- do you have it, Mr. Snelson?

5 A. Yes.

6 Q. Good. It says Lakeview TGS, for  
7 example, is assumed to be the marginal station in the  
8 short term for planning purposes.

9 Now, that is the short-term capacity  
10 number in the March SICs; right?

11 A. Yes.

12 Q. Good. It is true, isn't it, that  
13 that change in assumption is in fact the biggest single  
14 change in your SICs; isn't that correct? Has more  
15 impact than any other change?

16 A. I couldn't confirm that. I would  
17 have to go and make a lot of comparisons to confirm it.

18 Q. Well, we will see if we can get a  
19 sense. In March you were calculating avoided cost  
20 based on an assumed surplus; is that right?

21 A. The March values were based on a  
22 managed surplus case in what would otherwise have been  
23 a surplus situation, yes.

24 Q. There was still a surplus, right,  
25 same as you have now? I mean, a slightly different

1 size, but still a surplus?

2 A. The base for the planning values was  
3 a case where the surplus was managed.

4 Q. And in the November SICs, that is  
5 also true; correct?

6 A. The November SICs are based on the  
7 case where the surplus is managed to the degree to  
8 which the October board decisions would have managed  
9 the surplus. So it is not a completely managed case.  
10 There is still some replanning surplus.

11 Q. It is fairly similar. Is it a big  
12 change?

13 A. It is a change that -- you can review  
14 the October board memo, and you will see that there is  
15 still a surplus of the order of a thousand megawatts in  
16 quite a few years.

17 Q. Now, if we were to compare project  
18 appraisal avoided costs for March and November one of  
19 the factors that would skew that difference is the  
20 amount of uncommitted NUGs and DSM; right? That amount  
21 would have changed in that time, perhaps?

22 A. If that amount had changed then that  
23 would affect the difference, yes.

24 Q. But if we look at the planning  
25 numbers then we don't have any impact of the committed

1 component, right, or the uncommitted component?

2 A. I believe if we look at the planning  
3 values we have the full impact of the uncommitted  
4 values.

5 Q. Planning values are delta kilowatt  
6 and delta kilowatthour numbers?

7 A. Yes.

8 Q. So they don't have any of that  
9 uncommitted DSM and NUGs in there, do they?

10 A. They have all of it in there.

11 Q. Well, they have all of it as sunk;  
12 right?

13 A. They have all of it in the plan on  
14 which the values are based.

15 Q. The point is -- all right.  
16 Nevermind.

17 Take a look at Exhibit 592, the table of  
18 "Planning Values" at the end. It is the sixth last  
19 page, it looks like, "Planning Incremental System  
20 Values of Power". Date at the bottom is March 1, 1992.  
21 Do you have that, Mr. Snelson?

22 A. Yes, I do.

23 Q. Okay. And there is a column that  
24 says "Cost of Generation". This is the column to which  
25 that Lakeview-Lennox discussion we were having relates;



1 correct?

2 A. It certainly affects that column,  
3 yes.

4 Q. And you see that the annual cost per  
5 kilowatt in 1992 dollars is \$31.60 for about the next  
6 16 years. Do you see that?

7 A. Yes.

8 Q. Then it goes up as you add  
9 generation; right?

10 A. Yes.

11 Q. Okay. Now I would like you to turn  
12 to attachment D of Exhibit 796, and at the back there  
13 is a similar chart headed up "Planning", dated November  
14 24, 1992. It says, "Incremental System Values of  
15 Power". Again, it is about the, I don't know, fifth or  
16 sixth last page in the package. Do you have that, Mr.  
17 Snelson?

18 A. Yes, I do.

19 Q. Now, with your new assumption of  
20 mothballing Lennox, the annual cost of generation -  
21 this is the value per kilowatt - is not \$31.60 anymore;  
22 it is \$3.97. Correct?

23 A. Yes.

24 Q. Okay. Will you confirm that there  
25 has in fact been about a 65 per cent drop in the net

1 present value of capacity from the March numbers to the  
2 November numbers? Can you confirm that that is the  
3 case? The net present value, your cost of generation  
4 line, you will find a 65 per cent drop?

5 A. Over what time period?

6 Q. The time period being estimated here.

7 A. Are we talking about a kilowatt of  
8 capacity coming into service in 1993 and lasting to  
9 2027?

10 Q. Yes.

11 A. Clearly, there is a very large drop  
12 up until 2008 if we are talking about planning values--

13 Q. Yes.

14 A. --which is a function of surplus  
15 capacity and the assumption that you have referred to  
16 in respect to Lakeview; all right?

17 I haven't done the present value -- that  
18 is a drop that is more than your 65 per cent. I  
19 haven't done the calculation as to what is the weighted  
20 average over the full time period.

21 Q. So you don't know whether there has  
22 been a 65 per cent drop in the value of power?

23 A. No, sir, I don't.

24 Q. You said that the reason that there  
25 has been a substantial drop -- you agree that there has

1       been a substantial drop, yes?

2                   A.   There has been a very substantial  
3       drop, particularly during the period of capacity  
4       surplus, yes.

5                   Q.   And there are two reasons for that.  
6       One is your change of assumption from Lakeview to  
7       Lennox, and the other one is the fact that there is a  
8       surplus?

9                   A.   Yes.

10                  Q.   But then there is a --

11                  A.   Well, the change with respect to  
12       Lakeview -- and let me just consult.

13                  We believe it is the Lakeview-to-Lennox  
14       comparison, but that should require -- may require  
15       changing.

16                  Q.   I guess the problem I had with this,  
17       and the reason why I am going into it, is, you know,  
18       generally speaking your practice is when you make a  
19       significant point, you talk about a significant change  
20       in methodology or assumptions, you make a point of  
21       flagging it for the reader so the reader understands  
22       this is what this is all about.

23                  And you definitely refer to this point on  
24       page 3, again on page 11 you refer to it, but nowhere  
25       do you say cost of generation has dropped like a stone

1       because we changed this assumption. And I don't  
2       understand why you didn't flag that so it was clear.

3               A. Well, we are only looking at the cost  
4       of power, and in many, many cases the cost of energy is  
5       the largest factor. I wasn't involved in the writing  
6       of this document, but they have certainly addressed the  
7       fact that there has been a change in assumption. I  
8       can't go beyond that.

9               Q. Interestingly enough, the other  
10      methodological change that we know about, which is  
11      excluding the interarea transmission credits, and that  
12      doesn't have anywhere near the impact we are talking  
13      about for Lakeview to Lennox, does it? Much smaller  
14      impact, right?

15              A. I would say it is of the same order  
16      of magnitude.

17              Q. Mr. Snelson, look at Exhibit 592,  
18      that chart that we have just looked at, incremental  
19      system values of power--

20              A. Yes?

21              Q. --and then look at the same chart in  
22      796 at the interarea transmission numbers.

23              A. Yes.

24              Q. Net present value of that chain of  
25      numbers is not even a small fraction of the cost of

1 generation change, is it?

2 A. Well, I'm just looking at the values,  
3 and I see the bulk transmission values being of the  
4 order of 13 to 15. I see interarea transmission values  
5 once a need -- once they are identified as being of the  
6 order of 12, and my comment was essentially based upon  
7 a -- 12 and 14 is 26, which is of the order of the  
8 difference between four and 32.

9 Q. Why are you adding in bulk  
10 transmission here? Is this a new policy we haven't  
11 been told about yet?

12 A. I apologize. I have misinterpreted  
13 it. It is only the changes with respect to the  
14 interarea transmission. And you are right, it is a  
15 small change.

16 Q. And because the first 16 years of  
17 that is zero, dropping out that value in the  
18 calculation on a net present value basis is going to be  
19 a very small number, isn't it?

20 A. It is a much smaller number, yes. I  
21 agree to it.

22 Q. But yet, when you changed your  
23 assumption about that on page 2 of your report you put  
24 it in bold type so we wouldn't miss it. Why wouldn't  
25 you do that with the bigger change of Lakeview to



1 Lennox?

2 A. Well, I guess this is a little bit of  
3 speculation as to what was in the minds of the authors  
4 of this document when they wrote it, but quite clearly  
5 the issue with respect to transmission is a change in  
6 how the numbers should be used by whoever is reading  
7 this document, and so it would be reasonable to bring  
8 that quite strongly to their attention as opposed to  
9 the reason behind why the numbers have changed, but  
10 they should still use them in the same way.

11 Q. Okay. One other question about this  
12 Lakeview change. I guess I am trying to figure out the  
13 order that this sort of thing goes in because it seems  
14 circular to me and maybe I am just misunderstanding it.

15 You have sort of a generation plan that  
16 has Lakeview as your swing station. You then do the  
17 capital program review and you use the old SICs to do  
18 that, which has Lakeview in. So those SICs assume that  
19 you are using Lakeview as the swing station; right?

20 A. Yes.

21 Q. And in your capital program review  
22 you calculate whether it is a good idea to close  
23 Lakeview, and using these numbers that assume it is  
24 open you decide it is good idea to close it. Isn't  
25 that what the capital program review said?

1                   A. That was part of the analysis that  
2                   led to the closing of it, yes.

3                   Q. Okay. So then, having determined  
4                   that Lakeview should be closed according to a model  
5                   that assumes that Lakeview is open you then produce a  
6                   new set of SICs in which Lakeview is out; is that  
7                   right?

8                   A. Yes.

9                   Q. And if you were to do an analysis now  
10                  of whether the decision to close Lakeview is cost  
11                  effective on new information, that decision to close  
12                  Lakeview would be assumed in your data; right?

13                  A. There is a sense in which you can  
14                  never be quite up to date in your assumptions in  
15                  that -- in using this type of method, yes.

16                  Q. And, of course, that is the reason  
17                  why your internal procedures are that you use  
18                  production simulations for this type of decision;  
19                  right?

20                  A. Production simulations is part of a  
21                  more detailed way of doing this.

22                  Q. And production simulations do not  
23                  have that problem of circularity, do they?

24                  A. If you calculate completely through  
25                  on fully consistent scenarios that doesn't have that

1 problem.

2 Q. Great. Page 5 of the system  
3 incremental costs refer to the 10 per cent preference  
4 premium, and just -- perhaps could you update us.

5 There was a discussion earlier on - I  
6 don't remember what Panel it was, maybe Panel 3 - about  
7 whether this was calculated right, you know, whether it  
8 was based on the mean or the median and all that sort  
9 of stuff.

10 Have you corrected your calculation of  
11 that premium based on those discussions?

12 A. I'm sorry, I'm not sure what  
13 discussions you are referring to.

14 Q. Well, we discussed - I'm sure it was  
15 in Panel 3 - the question of whether this uncertainty  
16 band under which you base this calculation of a premium  
17 was correctly around a -- I don't remember whether it  
18 was -- should have been a mean and it was a median or  
19 it should have been a median and it was a mean, but  
20 your witnesses said, yes, we are doing it around the  
21 wrong base, but it doesn't make a big difference so  
22 don't worry about it.

23 Have you corrected your methodology, is  
24 what I am asking? That is all I am asking.

25 A. We still apply a 10 per cent

1 preference premium for the same things for which we  
2 applied the 10 per cent preference premium before.

3 Q. And the calculation of that  
4 preference premium as related to your avoided cost  
5 bandwidth, has that calculation changed?

6 A. Well, the preference premium was not  
7 100 per cent based on a calculation. There was a  
8 calculation which you are referring to which was used  
9 as one part of the -- the supporting judgment for a 10  
10 per cent preference premium, and I don't believe that  
11 that calculation has been redone.

12 [11:43 a.m.].

13 Q. It's not been changed. Okay. If you  
14 take a look at page nine of the System Incremental  
15 Costs, this...no, I've already dealt with that. That's  
16 all right. That's the same set of questions in two  
17 parts of my list here. I think my word processor just  
18 threw it in.

19 Page 11 says under -- we've talked about  
20 limitation No. A., which is big change in load growth,  
21 don't use these numbers. Limitation B is don't use  
22 these numbers for more than 50 megawatts in changes;  
23 but, in fact, for all of your capital program review,  
24 that's what you did, right?

25 A. B says if the difference is to be

1 evaluated to more than 50 megawatts, consult the Power  
2 Source Integration Department.

3 Q. I'm sorry. You're absolutely  
4 correct.

5 So you did that. They said, go head, it  
6 doesn't matter what the number is.

7 A. They were involved in the  
8 calculations and application of it to the capital  
9 program.

10 Q. Okay. Will you take a look at the  
11 charts attached to this exhibit; and what I'd like you  
12 to do is look at the incremental system values of  
13 energy. Maybe just look at the project appraisal. And  
14 it's probably just as easy to look at winter peak. I  
15 understand that the impact of this changes from line to  
16 line, but I just want to use one as an example.

17 And these are real dollars, right? We're  
18 looking at Project Appraisal Incremental System Values  
19 of Energy, Winter Peak. Those are real dollars,  
20 correct?

21 THE CHAIRMAN: 1993 dollars.

22 MR. SNELSON: It says at the top there  
23 1993 dollars a megawatthour

24 MR. SHEPHERD: Q. Okay. So they're all  
25 in -- they're not nominal, they're real?



1 MR. SNELSON: A. They are--

2 Q. Thank you.

3 A. --without escalation.

4 Q. Good. And we've talked about this  
5 before, and I don't want to go through the issue again.  
6 I just want to get your update. These values go up  
7 until 2016, and then they drop and stay constant. Now,  
8 as I understand, we just graphically illustrated that  
9 to show you what we understand that to mean. This is  
10 on page 4 of Exhibit 938.

11 Will you confirm, subject to check, that  
12 the cross-hatched, or whatever that's called, area at  
13 the bottom represents the area of your winter peak  
14 values of energy, fairly? Subject to check, of course.

15 A. It looks close. Again, subject to  
16 check, yes.

17 Q. Great. Now, you explained, I think,  
18 in Panel 3 maybe, that the reason why we see this drop  
19 at the end of the current planning period for all the  
20 rest of the years is that you take the average of five  
21 years or something and you apply that average then to  
22 all the rest of the years in real terms; is that right?

23 A. That is correct.

24 Q. Okay. And the effect of that is that  
25 if there are increasing power rates, or sorry,

1 increasing values of winter peak energy, those  
2 increases aren't captured, correct?

3 A. I'm sorry. What increases aren't  
4 captured?

5 Q. Well, if you just take a look at this  
6 chart, you will see there's roughly a trend upwards,  
7 and, in fact, we've drawn it for you in case it wasn't  
8 that obvious, but your assumption cuts off those  
9 additional increasing values, right?

10 A. Well, you are presuming those  
11 increasing values are real and are expected.

12 Q. No. All I'm asking is if they are  
13 there, you would cut them off, right?

14 A. Well, quite clearly, that is so.

15 Q. Great. Okay. And the my question  
16 is: That methodology is something we discussed earlier;  
17 have you made any change to that methodology to try to  
18 adapt your system incremental costs for trends in  
19 values?

20 A. Well, the trend that you've shown  
21 here is quite inappropriate.

22 Q. It may well be.

23 A. We haven't changed our methodology  
24 with respect to the long term since Panel 3.

25 Q. Are you reviewing it? Are you

1 looking at it critically to see whether it should be  
2 changed?

3 A. I don't know of any active process to  
4 redo it.

5 DR. CONNELL: I wonder if I could just  
6 interpolate a question?

7 I'm afraid, Mr. Snelson, I got lost in  
8 your responses to questions about the impact of the  
9 switch from -- from Lakeview to Lennox, particularly on  
10 the costs of capacity, and I wonder if this would help  
11 me to understand. Let's suppose there had been no  
12 other changes between March and the date of the new  
13 SICs, except the change from Lakeview to Lennox as the  
14 reference generation source.

15 Would we have seen, in fact, much change  
16 in the magnitude of the SICs for cost of generation in  
17 those first 15 or 16 years?

18 MR. SNELSON: At a reasonably high  
19 capacity factor where you have both capacity and energy  
20 values, then the change would have been much less  
21 proportionately than this change that we're looking at  
22 which is only in the capacity values.

23 DR. CONNELL: Yes.

24 MR. SNELSON: I'm just trying to do some  
25 quick arithmetic here to try and give you an order of

1 magnitude, but if the change is \$30 per kilowatt per  
2 year between the two sets of capacity values, and if  
3 that is evaluated on something which has, say,  
4 equivalent use of 5,000 hours a year, which is -- I'm  
5 just choosing a round number, but that's about 57 per  
6 cent capacity factor, so it's a moderately high  
7 capacity factor but not as high as the system average.

8 Then you divide the 30 kilowatts -- \$30  
9 per kilowatt per year and you would end up with six \$6  
10 per megawatthour, I believe, if I've done my arithmetic  
11 correct.

12 So, if you look at Figure 1, Combined  
13 Values of Power and Energy, then -- and that is at 70  
14 per cent capacity factor, that is on page 10 of the  
15 attachment, then with regard to the planning values,  
16 that could explain the order of \$5 or \$6 dollars per  
17 megawatthour difference between those figures.

18 DR. CONNELL: Yes.

19 MR. SNELSON: Which in fact is quite a  
20 large proportion of the difference in the planning  
21 values.

22 DR. CONNELL: Thank you.

23 MR. SHEPHERD: Q. Mr. Snelson, just  
24 looking at that Figure 1, it looks like \$5 or \$6 for  
25 most years is almost all of that difference, isn't it?

1 Most years, not all years.

2 MR. SNELSON: A. Not all years. It  
3 is -- it is a -- quite a proportion of it, yes. There  
4 may be some other offsetting factors that have gone one  
5 way or the other.

6 Q. Of course. All right.

7 Mr. Burke, let's come back to you and the  
8 load forecast. And I wonder if you could look at your  
9 load forecast report. I'm on page one. You will see  
10 in the -- do you have that there, Attachment C of  
11 Exhibit 796?

12 MR. BURKE: A. Yes.

13 Q. And On page one in the second to the  
14 last paragraph, there's a reference to more complete  
15 documentation being available on short-term analysis.  
16 It looks like the end-use model results, the EEMO  
17 model, demand management impacts. You have more stuff  
18 coming on this, right?

19 A. Yes.

20 Q. And so I wonder if you could just  
21 undertake to file those things when they're ready.  
22 Could you do that?

23 A. When they're ready, certainly.

24 Q. Wonderful.

25 THE CHAIRMAN: That's been the practice,



1 but do you want it enshrined in an undertaking?

2 MR. SHEPHERD: Yes, Mr. Chairman. I  
3 don't know which ones they will think are relevant,  
4 so...

5 THE CHAIRMAN: All right. What's the  
6 next undertaking number?

7 THE REGISTRAR: Point 7.

8 ---UNDERTAKING NO. 940.7: Ontario Hydro undertakes to  
9 file more complete documentation on  
10 short-term analysis: end-use model  
11 results, the EEMO model, demand  
12 management impacts.

11 MR. SHEPHERD: Q. Now, Mr. Burke, in  
12 general terms in this forecast, do I understand your  
13 evidence to be that electricity prices are increasing  
14 and so more of the demand management that you are after  
15 originally will now be naturally occurring rather than  
16 program driven. Is that a fair characterization?

17 MR. BURKE: A. Well, actually comparing  
18 this forecast to last year's, there's very little  
19 difference in the electricity price scenario; and so  
20 between this year and last year, that is not a major  
21 factor.

22 Q. But isn't it correct that you are  
23 expecting a lot more demand management to be naturally  
24 occurring rather than program driven?

25 A. I wouldn't describe it as a lot. A

1 little bit more.

2 Q. Wait a second.

3 Okay. I'm going to ask you to look at  
4 page 4 of Exhibit 796, the main component. And if you  
5 take a look, after the first set of bullets, you see  
6 the paragraph that starts "at a significant portion,"  
7 and you have said:

8 Energy management potential is going to  
9 come now more from code standards and  
10 information-driven fuel switching with  
11 less emphasis on financial incentives.

12 Then you go on to say that the price differential  
13 between gas and electricity is now seen to be  
14 sufficient to encourage conversion to alternate fuels.

15 And, I guess -- in fact, you go on to say  
16 later that you expect to have less opportunities for  
17 program driven demand management because of what you  
18 call the changing economic outlook in the energy  
19 picture.

20 And I guess I had understood that all to  
21 say we're not going to do as much; the marketplace is  
22 going to do more by itself. Am I understanding that  
23 wrong?

24 A. I believe you worded your question in  
25 terms of efficiency improvement, and now you're

1       generalizing to demand management as a whole. I don't  
2       consider fuel switching to be in the same category as  
3       efficiency improvement, so my answer referred to the  
4       efficiency improvement portion of the demand management  
5       program. What the text you're referring to here refers  
6       to is largely the fuel switching component, which is a  
7       function of the relative price of electricity and gas;  
8       and there, as I said in my direct evidence, gas prices  
9       are significantly lower, and that is a change. And I  
10      also suggested that there was a behavioural change  
11      going on in response to that relative price  
12      differential in my direct evidence.

13                     Q. Okay.

14                     A. But the answer I gave you to begin  
15      with was how much natural efficiency improvement is  
16      going on and in response to a change in electricity  
17      prices, that's what I understood your question to be,  
18      and in that, my answer stands.

19                     That's not very much price induced --  
20      sorry. That's not very much price induced demand  
21      management, although demand management will, in fact,  
22      occur naturally in the marketplace more than your  
23      current estimates.

24                     Q. Demand management I'm talking about  
25      now; is that right?

1                   A. Well, if you're talking about demand  
2 management, that's different from the question you  
3 asked me to begin with, and there is a fair bit of  
4 price-induced fuel switching in this forecast, and  
5 that's not just a function of the electricity price.  
6 It's a function of the electricity price and the gas  
7 price.

8                   Q. Great. Your methodology has  
9 population driving GDP; is that right? I'm just trying  
10 to remember from --

11                  A. Population is an input to one of the  
12 forces that determines long-term GDP growth. Long-term  
13 GDP growth may sometimes be forecasted using labour  
14 force growth and output per employed worker, and labour  
15 force is a function of population. So indirectly, yes,  
16 it drives GDP in the long run.

17                  Q. Okay. Now, you're estimating faster  
18 population increases than in your last load forecast,  
19 right?

20                  A. Yes.

21                  Q. Okay. But you're also estimating  
22 lower GDP growth in the short term or maybe a lower  
23 starting point. I don't know, one or the other; is  
24 that right?

25                  A. Growth rates are about the same for

1 the first two years compared to a year ago and then  
2 they get higher, but, yes, they start from a much lower  
3 base.

4 Q. And then those facts, the population  
5 increase and the lower GDP amount, tend to offset each  
6 other, right?

7 A. Well, I indicated in my direct that  
8 the effect of the higher population growth tends to  
9 raise the GDP forecast about 4 per cent relative to  
10 what we would would have gotten last time. And since  
11 we lost about 6 per cent over the last couple of years  
12 one way or the other, we get to, at the end of the  
13 period, within about 2 per cent of the level for GDP in  
14 2015 that we've said in 1991.

15 Q. Great. Now, you've also assumed in  
16 general an increase in energy, sorry, in electricity  
17 intensity in the economy; correct?

18 A. I haven't assumed that; I derive it.

19 Q. Oh, sorry. It's not historical data,  
20 but it is a calculation you have made from other  
21 assumptions?

22 A. Well, after we get the load forecast  
23 for the purpose of demonstrating some of the properties  
24 of the load forecast, we proceeded to divide the  
25 primary load forecast by the GDP levels to determine



1 what the electrical intensity turned out to be.

2 Q. Oh, I see. So where you say on page  
3 4 of your load forecast, you say both EEMO and the  
4 end-use system became more electricity intensive as the  
5 quality of these models improved, electricity intensity  
6 is a result that kicked out of those models after  
7 you've run them, right?

8 A. Yes. We're now going over very old  
9 ground, because the change that you're referring to was  
10 between the '89 and '90 forecast.

11 Q. Yes.

12 A. And, yes, in the case of the  
13 econometric models, you estimate the equations; you see  
14 what the answer is. In the case of the end use, we  
15 incorporate the latest data that we have, calibrate to  
16 that data, and then we can determine after the fact  
17 that, yes, electricity intensity, the amount of  
18 electricity used per unit of output, has changed.

19 Q. Okay. I'm sorry I'm going over old  
20 ground. I didn't mean to. What I'm really after is  
21 this: That electricity intensity, because it's a  
22 result, that increase suggests that our use of  
23 electricity in the economy is going to increase faster  
24 than our demand management, our conservation of  
25 electricity over the same time frame, right?

1 [12:06 p.m.]

2 A. I think we're comparing apples and  
3 oranges here. I'm really not sure what you're getting  
4 at.

5 Our forecasts that we have before the  
6 Board now shows electrical intensity falling faster in  
7 this forecast than in either the previous one or the  
8 one before that for very many reasons.

9 How that relates to demand management I  
10 don't -- I don't understand. With respect to --

11 Q. Your expected -- your basic load  
12 forecast assumes more demand management than the last  
13 one; right?

14 A. The basic load forecast has more  
15 people converting from electric space heating to  
16 natural gas and a lower incremental market share of  
17 electricity in those markets than the last one did.

18 Is that the same thing that you just  
19 said?

20 Q. Well --

21 A. I shouldn't be asking questions,  
22 sorry.

23 Q. I asked demand management; right?  
24 There's more demand management in your basic load  
25 forecast than the last time. I mean --

1                   A. By definition the word 'demand  
2 management' to me means something that you actually  
3 manage as opposed to a response to market forces. the  
4 basic load forecast doesn't so much have demand  
5 management in it. It has fuel switching, it has  
6 efficiency improvement.

7                   Q. Whatever you call it, all those  
8 various decisions to use less electricity - right? - a  
9 nameless group, they are not going to be as much in our  
10 estimate as the increases in electricity use from other  
11 sources, for example industrial processes, et cetera;  
12 is that correct? That's the effect of saying there's  
13 going to be more electricity intensity; right?

14                  A. I think the total change between '89  
15 and '90 load forecast in broad electricity intensity  
16 terms, holding the other variables constant as much as  
17 I think we could, was of the order of 7 or 8 per cent.  
18 In the demand management that we had in the 1991  
19 forecast, which if it isn't as a program -- just the  
20 program component, I think, was reducing demand 14 or  
21 15 per cent by the year 2000 and much more by 2015.

22                  I'm not sure where you are getting the  
23 inference from.

24                  Q. Last sentence of page 4, it says:

25                         It is the increase in the electricity

1 intensity of the forecast that kept the  
2 1991 basic load forecast very close to  
3 the DSP levels.

4 And we have here this whole discussion  
5 about -- your projection that Ontario will continue to  
6 be more electricity intensive, and you have just said  
7 that is a result of your models, that is not an  
8 assumption. So I don't know --

9 A. It's the change. I can't tell you  
10 what the total amount of -- in fact, it would be a  
11 major job to calculate what the total increase in  
12 intensity is over the period relative to the total  
13 increase in efficiency.

14 All I was indicating was that between '89  
15 and '90 or '91 load forecasts the model results would  
16 give a higher value, a higher amount of kilowatthours  
17 consumed per unit of GDP for all manner of reasons. It  
18 could be because the market shares were higher; it  
19 could be because we learned more about the actual use  
20 of electricity per unit of output, all manner of  
21 reasons. And that was in the model changes that were  
22 going on between '89 and the '90 load forecast  
23 primarily.

24 There is an interrogatory response that  
25 explains all of that as well.

1 Q. Yes, I know. I'm only concerned with  
2 this load forecast. Maybe that question is a much  
3 simpler one.

4 Taking all things into account, is it  
5 your current projection that the electricity production  
6 in Ontario per unit GDP is going to increase over the  
7 planning period or decrease over the planning period?

8 A. Electricity consumption?

9 Q. Production consumption.

10 A. Per unit of GDP as indicated in...I  
11 guess it's page 6 of Exhibit 937 was in order, I  
12 believe. And it declines pretty steadily and fairly  
13 significantly from its 1992 levels.

14 Q. Let me just see that --

15 A. And at a faster rate initially than  
16 the previous two load forecasts.

17 Q. What page is it?

18 A. Page 6.

19 Q. And so if I understand this correctly  
20 then -- I'm going to have to think about this. I'm  
21 lost. I mean, I know what you are saying. I  
22 understand what you are saying; I'm just lost.

23 Let's go to page 3 of your load forecast.  
24 And the first paragraph there says:

25 The first is a one-to-one



1 relationship between Ontario GDP and  
2 basic load in the long run.

3 That would be -- in a model like EEMO,  
4 you would have that sort of a relationship; right?

5 A. Yes.

6 Q. But that wouldn't arise in your end  
7 use model unless the end use results achieved it by  
8 coincidence; right?

9 A. It would be very difficult in the end  
10 use model to isolate what the strict relationship  
11 between Ontario GDP and basic load is, for a variety of  
12 reasons.

13 The reason you can do it -- to make it  
14 simple, the reason you can do it in the econometric  
15 model is you specifically isolate the effect of GDP  
16 from that of prices and any other factor that happens  
17 to be in the equation, but in the end use model you are  
18 not -- often not dealing with GDP in terms of value  
19 added, you are dealing with physical units like numbers  
20 of houses, and square footage, and tons of steel and so  
21 on.

22 And you can after the fact calculate what  
23 the end use forecast is per unit of GDP, but the part  
24 that is purely associated with the GDP that is not a  
25 function of the change in prices and so on, and other

1 assumption changes, that's very difficult to isolate.

2 Q. This year you have elected to use the  
3 end use forecast as the forecast ones you tuned it for  
4 the long term; right?

5 A. Yes. And that's not too different  
6 from what we did last time in 1990.

7 Q. Understood. But there is a very big  
8 difference between the EEMO forecast and the end use  
9 forecast this time, isn't there?

10 A. I do believe there's less difference  
11 than last time that both were done in 1990, but it's  
12 roughly the same. The commercial sector models for the  
13 econometric and end use were dramatically different. I  
14 believe they're 25 terawatthours different in 2015 and  
15 they are only 20 terawatthours in this forecast.

16 So I think that -- well, it's close. I  
17 mean, the econometric model was higher last time and  
18 it's higher this time.

19 Q. Am I going over old ground here?  
20 Because if I am I don't mean to.

21 A. In my view, yes.

22 Q. I'm sorry. Let me just ask you the  
23 final point in this then, and you can tell me whether  
24 that's already been covered, too.

25 Is the effect of using the lower end use

1 forecast to in effect degrade that one-to-one  
2 relationship between GDP and load; that is to say,  
3 because it's lower, you are not assuming that  
4 one-to-one relationship anymore, are you?

5 A. I think that's a reasonable  
6 conclusion, that if we could pull it out of the end use  
7 model we would get a lower number than one-to-one.

8 Q. And maybe that answers my question  
9 about this page 6 of Exhibit 937, because using the end  
10 use model with a lower ratio of -- or implicit lower  
11 ratio of GDP to load would produce this lower energy  
12 intensity, wouldn't it, per unit GDP?

13 A. Well, it does, but the major  
14 determinant here is the prices, you know. If you have  
15 a large proportion of the space heating load that was  
16 electric shifting away from electricity, then the  
17 primary electric load is going down and you haven't  
18 changed GDP.

19 So it has nothing to do with GDP or the  
20 ratio between -- see, the ratio that I'm giving you for  
21 the econometric is not load divided by GDP; it is how  
22 much load would change for the change in GDP. So it is  
23 a sort of a before-the-fact kind of empirical  
24 relationship.

25 What we're calculating here is after I've

1 got the load now divide it by GDP, and lots of the  
2 changes are to the load, not to GDP or to the  
3 relationship between load and GDP per se. It's because  
4 we've changed the prices, and so we've lost a lot of  
5 the space heating load.

6 We lost it through programs last year,  
7 and this year we're losing it in response to market  
8 forces more.

9 Q. Now I do understand.

10 Could you turn to page 10, please? No,  
11 actually, skip that. Why don't you just go over to  
12 page 17. I'm going to leave my demand management  
13 questions to somebody who understands them better,  
14 because I'm not doing very well with them.

15 Page 17, this is a chart I had a lot of  
16 problem with. This chart seems to suggest that all of  
17 your forecasts from '88 through '92 of electricity  
18 prices had the same number for 1991.

19 Now, I must be misunderstanding that;  
20 right?

21 A. Yes. [Laughter]

22 Q. Now, if the 1988 forecast had 1991 at  
23 say 10 per cent higher than it actually was, then the  
24 low line you have here for the 1988 forecast, that  
25 would actually be much higher; right? Everything would

1 be higher on that line, if you were looking at real  
2 prices, real forecasts instead of index?

3 A. This is a plot of an index against  
4 1991 equals 100, as it says underneath the title.

5 If you want to get a plot of what the  
6 relative -- you know, the absolute price changes are  
7 you have to look at a different plot, because this is  
8 specifically designed to normalise all the numbers in  
9 1991 so that you can see the changes from 1991 on.

10 Q. What is it we learn from this chart,  
11 then?

12 A. We learn that --

13 Q. What conclusions can we make?

14 A. -- that from 1991 on electricity  
15 price increases are higher in later forecasts from '88  
16 through '90, but they're pretty similar in the '91 and  
17 '92 forecasts.

18 Q. Can we conclude that from this if  
19 these aren't the real prices that you have estimated?

20 A. These are -- what we're talking about  
21 is the rate of change. The rate of change you can  
22 conclude from this.

23 Q. So it's like the shape of the line?

24 A. Yes. You can conclude that from --  
25 the 1992 forecast is 20 per cent, where it's -- by '94.



1 So it seems to be at an index of 120, that that  
2 forecast is 20 per cent higher than the 1991 price, and  
3 the '88 forecast looks to have been in real terms a  
4 little less than the 1991 price. You can conclude  
5 that.

6 Q. Now, if you had a chart of your  
7 actual electricity price forecast, put them all in the  
8 same dollars, it wouldn't look anything like this;  
9 right?

10 A. How do you mean it 'wouldn't look  
11 anything like that'?

12 Q. Well, all of these forecasts didn't  
13 have the same number for 1991, did they, so they  
14 wouldn't cross at the same point; right?

15 A. That's true. But the change from  
16 1991 on would be correct if it's correctly portrayed by  
17 this one.

18 Q. I'm not arguing with the shape, Mr.  
19 Burke. But it is true, isn't it, that from this chart  
20 we can't tell whether, for example, the 1988 forecast  
21 wasn't way above the 1991 forecast, or vice versa. We  
22 can't tell that.

23 A. What this chart indicates for 1988 is  
24 that it forecasts no real change in prices between 1988  
25 and 1991.

1                   What you can conclude, I guess, looking  
2                   at the 1991 and 1992 forecasts which had the data for  
3                   1991 in it, is that there was in fact about a, oh, 4 or  
4                   5 per cent real increase between 1988 and 1991.

5                   Q.   Sorry?

6                   A.   Because you can see that the 1991  
7                   lines and 1992 lines start from -- their 1988 value  
8                   is -- is about 4 per cent or so below?

9                   Q.   No, it isn't.

10                  A.   Sure it is.  If you --

11                  Q.   That only assumes that 1991 is the  
12                  same.  If 1991 is different, and in fact in these  
13                  forecasts it would be, then isn't it correct that all  
14                  of the other relationships are also different?

15                  A.   I'm trying to be helpful.  If you  
16                  look at the 1991 and 1992 lines for 1988 you will see  
17                  it is below 100.

18                  Q.   Yes.

19                  A.   So the difference between where there  
20                  are in 1988 and where they end up in 1991 tells you  
21                  what the price difference in those -- between '88 and  
22                  '91.  And that is the extent to which, if you were to  
23                  have revised this plot and not tried to index them at  
24                  100 in 1991, the lines would shift.  The lines would  
25                  move up by the gap that exists in 1988 between the

1 lines. That's all that would happen. It would shift  
2 up.

3 You could index this to 100 in 1988 and  
4 have all of the lines move from there, and the  
5 difference would be to spread the lines apart by the  
6 gap between 1988 -- that exist between the lines in  
7 1988 on that plot.

8 Q. Well, in fact, if you look at the  
9 next page this is your natural gas price forecast.

10 Now, for some reason you didn't use an  
11 index method for this. You used actual prices. So  
12 this tells us the relationship of each forecast to the  
13 other forecast; right?

14 A. Yes, I --

15 Q. You can see that?

16 A. Yes.

17 Q. Whereas the previous chart doesn't  
18 tell us that, does it?

19 A. No.

20 Q. Good.

21 A. Not directly.

22 Q. By the way, this chart on page 17  
23 doesn't include a 1989 line. Was there no line for  
24 1988; is that...?

25 A. I only -- all these comparisons, as

1       you may have noticed, right through this section are  
2       for four forecasts: the DSP forecast; the 1990  
3       forecast, which was the basis of evidence in Panel 1;  
4       and the 1991 forecast, which is the update; and the  
5       1992 forecast, which we are here about.

6                     The DSP forecast was based on the 1988  
7       basic load forecast.

8       [12:20 p.m.]

9                     Q. All right. The chart on page 17 says  
10       it comes from the Energy Price Trends report November,  
11       1992, but I had looked in there and I couldn't find it.

12                    Can you show us where it is? Perhaps  
13       just undertake to tell us where it is when you find it.

14                    A. I think you may have a point, that it  
15       is the '91 and '92 results that you will find in the  
16       retail -- that particular issue of the Energy Price  
17       Trends document, and the other lines must come from  
18       earlier versions of the Energy Price Trends document  
19       which were filed.

20                    Q. I will find that for the chart on  
21       page 18 as well, that you have cited it as Energy Price  
22       Trends but it is not actually in there; right?

23                    A. Yes, the current information is  
24       from -- sorry, the information that refers to 1991 and  
25       '92 is in the Energy -- this issue of the Energy Price

1 Trends document, but the others were added and you have  
2 to go back to previous Energy Price Trends documents  
3 for those.

4 MR. SHEPHERD: All right. Mr. Chairman,  
5 that may be a good time to have lunch.

6 THE CHAIRMAN: All right. We will  
7 adjourn now until a quarter to two.

8 THE REGISTRAR: Please come to order.  
9 This hearing will adjourn until a quarter to two.

10 ---Luncheon recess at 12:26 p.m.

11 ---On resuming at 1:47 p.m.

12 THE REGISTRAR: Please come to order.  
13 This hearing is again in session. Please be seated.

14 MR. GREENSPOON: Mr. Chairman, I asked  
15 Mr. Shepherd if I could just have a word before the  
16 Panel...

17 Given the way the cross-examination is  
18 proceeding it appears as though there is a good chance  
19 that the motion will in fact be heard next week, and I  
20 just wanted to go on the record seeking Hydro's written  
21 response to that motion so that I will have some time  
22 to consider it and we are not taken by surprise. As  
23 yet Hydro has not filed anything with respect to the  
24 motion.

25 MS. HARVIE: Yes, I can respond to that,



1 Mr. Chairman. We are finalizing our written  
2 submissions now, and I expect they will be in as soon  
3 as possible. We haven't yet received final  
4 instructions at this time.

5 THE CHAIRMAN: Thank you.

6 Is Mr. Mattson here? Yes. We have a  
7 letter from you about the process in connection with  
8 the Northwatch motion, Mr. Mattson. You wanted some  
9 advice as to whether you could raise the issues that  
10 you raised in your letter?

11 MR. MATTSON: Yes, Mr. Chairman. I  
12 believe I sent that letter to yourself, to Ontario  
13 Hydro, and sent a copy to Mr. Greenspoon as well.

14 THE CHAIRMAN: Well, I think it would be  
15 appropriate that any submissions you want to make then  
16 should be made at that time.

17 In general - in general - any submissions  
18 that any party wants to make about the termination of  
19 the hearing in response to the Northwatch motion or as  
20 to the future of the hearing in general this is the  
21 time they should do it so that it will all be done at  
22 one time. We want to avoid the possibility of someone  
23 coming along later and saying, well, you have disposed  
24 of the Northwatch motion, but I still have these  
25 concerns and that concern about the future of the

1 hearing.

2 I think that anyone who wants to say  
3 anything to us about the future of the hearing either  
4 pro or con should do so contemporaneously with the  
5 Northwatch motion. This does not mean that there may  
6 not be some procedural things to work out at the time,  
7 but I think we will deal with that when it arises.

8 The position that I feel now, speaking  
9 for myself, is that the motion has been made by  
10 Northwatch, and Northwatch will be the first  
11 submissions that we hear. How we deal with the others  
12 we will have to see, depending on the nature and extent  
13 of them at that time.

14 MR. MATTSON: Thank you, Mr. Chairman.

15 THE CHAIRMAN: Now, Mr. Shepherd?

16 MR. SHEPHERD: I do hope on the motion we  
17 will have a 'confused' category and continue that  
18 process.

19 THE CHAIRMAN: Well, it would be the  
20 first time that we haven't had one so... [Laughter]

21 MR. SHEPHERD: Q. Mr. Burke, there is a  
22 background study being prepared on the statistical  
23 relationships contained in EEMO. Do you know when that  
24 will be released?

25 MR. BURKE: A. I am aiming for some time

1 in February.

2 Q. I wonder if you could undertake to  
3 file that then, please?

4 A. I think that is part of the package I  
5 undertook to file this morning.

6 Q. Is it? Wonderful. Okay.

7 If you would take a look at page 22 of  
8 the load forecast report you will see there is a list  
9 in the middle of page 22 of five things that are common  
10 between the EEMO approach and the end use model. That  
11 is what that list is; right?

12 A. Yes.

13 Q. And the second item on that is the  
14 projections for natural NUGs. I take it that it is  
15 fair to say that natural non-utility generation is in  
16 fact affected by end use issues, isn't it?

17 A. Did you say is 'affected by' end use  
18 issues?

19 Q. Yes. In the same way as demand  
20 management in particular sectors is affected by the  
21 development of a particular industry, et cetera.

22 A. Well, the methodology we have used to  
23 forecast is the one that is discussed -- that we have  
24 been discussing in chapter 4 of this document with the  
25 addition of industry-specific detail as provided by our

1 NUGs division, but it is not based on an industry-by-  
2 industry analysis. There is no other analysis of the  
3 amount of natural load displacement non-utility  
4 generation other than the one we have been discussing.

5 Q. Of course not. Of course. I  
6 understand. That at least I got out of our discussion  
7 this morning.

8 The question is, when you do an end use  
9 analysis, for example for steel, you make assumptions  
10 about growth in the area, you make assumptions about  
11 electric arc as opposed to more conventional  
12 approaches, and all of those same assumptions and  
13 considerations would go into whether companies in the  
14 steel industry would cogenerate; isn't that right?

15 A. The end use forecast is a forecast of  
16 demand for electrical services essentially in Ontario,  
17 and it doesn't concern itself with how the companies  
18 choose to supply those.

19 Use of end use detail could supplement  
20 some future analysis of natural load displacement  
21 non-utility generation, but we haven't used it that way  
22 so far.

23 Q. All right. Let me go to something I  
24 know is one of your favourite topics, load forecast  
25 uncertainty, page 127 of the load forecast. Do you

1 have that, Mr. Burke?

2 A. Yes.

3 Q. Now, your load forecast band width  
4 has gotten narrower again, hasn't it?

5 A. Yes, it is slightly narrower.

6 Q. And if I understand these three  
7 numbered points are to essentially explain why that is;  
8 is that correct?

9 A. Yes.

10 Q. So point No. 1 I am familiar with.  
11 That is that discussion about using a larger standard  
12 deviation where population increases are larger and  
13 vice versa? That is what your methodology is; correct?

14 A. Yes.

15 Q. So we have already gone over that in  
16 some detail before?

17 A. Yes.

18 Q. The second point has me a bit  
19 baffled, and I suspect it is just too technical for me.  
20 Could you just sort of paraphrase it?

21 A. Well, essentially there is an  
22 equation that between load and GDP, and the data that  
23 was used for GDP in that equation was revised.

24 The effect of that revision was to  
25 improve the fit of that equation. Therefore, there is



1 less residual uncertainty, less residual error. So  
2 that component which is simulated, the residual error  
3 of the equation, actually turned out to be smaller and  
4 its contribution to overall uncertainty was therefore  
5 smaller.

6 Q. So now, the historical data is data  
7 you get from StatsCan; right?

8 A. Yes.

9 Q. And they revise their data and  
10 provided new data for the same period?

11 A. Yes.

12 Q. Okay. Did you then re-estimate your  
13 function or did you just apply the same function and  
14 find it had a better fit?

15 A. I believe we were simply trying to  
16 use the same methodology as before. So we used the  
17 same specification; we just put in the current version  
18 of the data for GDP and ran it as before.

19 Q. Okay. I understand. The third point  
20 then is - and this is the one I had the most trouble  
21 with - it sounds like what this point is saying, and  
22 correct me if I am wrong here, is that in Hydro's  
23 methodology the higher the projections of energy  
24 growth, the greater the uncertainty band width, and  
25 vice versa; is that right?

1                   A. I'm not sure whether I am answering  
2           your question directly, but I think the only point that  
3           is being made in point 3 is that because the median  
4           value of the basic load forecast is lower the absolute  
5           size of the band width is lower, but in percentage  
6           terms, other things equal, it would be the same.

7                   It is simply saying that the band width  
8           is scaled to the level of the median. The median goes  
9           down seven per cent for the basic, so other things  
10          being equal the absolute gap between these numbers you  
11          would expect to be seven per cent less, is what this  
12          point is saying.

13                   Q. Okay. Now, I don't understand why  
14          that is. The logical result of that then presumably is  
15          that if you project zero growth you are 100 per cent  
16          certain of that projection; isn't that right?

17                   A. No, it would be plus -- certainly one  
18          would not want to take it to that degree.

19                   Perhaps what I should do is to -- the  
20          point is explained a little bit more in the next page,  
21          but -- should get some clarification.

22                   This is not a substantive issue here.  
23          This is a small portion of the difference. In fact, it  
24          is not explained -- it is only meant to...

25                   Q. Mr. Burke, would you rather think

1 about this and deal with it tomorrow?

2 A. Yes. I guess what I was going to  
3 propose is if there is some point that is not made in  
4 these pages that clarifies the issue that you have  
5 brought up about 'surely if you were to go in the  
6 extreme of this there must be something wrong' I will  
7 make it in an undertaking of some sort.

8 Q. You can make it an undertaking if you  
9 want. Sure.

10 A. Yes.

11 THE CHAIRMAN: Undertaking No. 8, is that  
12 right?

13 THE REGISTRAR: No. 8, correct.

14 ---UNDERTAKING NO. 940:8: Ontario Hydro undertakes to  
15 provide clarification of point  
16 number 2 on page 127 of the load  
forecast.

17 MR. BURKE: As Mr. Shalaby is pointing  
18 out to me, the issue -- the growth rate isn't the  
19 issue. The band width is about the level, and so the  
20 band width would still be plus or minus 20 per cent or  
21 so, about the level, whatever the growth rate is that  
22 is projected.

23 But as you change the level of the median  
24 forecast you do -- because it is 20 per cent of  
25 whatever that level is you actually narrow the absolute

1 band width. That is the only point of this. I don't  
2 think there is anything more or less to it.

3 MR. SHEPHERD: Q. The question I am  
4 asking is, what is the reason why uncertainty is less  
5 because load is lower?

6 MR. BURKE: A. I guess what we are  
7 saying is percentage uncertainty is the same, not  
8 absolute uncertainty. But if that point needs further  
9 explanation I can't offer it to you off the top of my  
10 head.

11 Q. All right. Thank you.

12 MS. HARVIE: Perhaps just to save  
13 ourselves some paperwork if Mr. Burke could give it  
14 some thought this evening and then advise you in the  
15 morning, if that would be satisfactory?

16 MR. SHEPHERD: That's fine.

17 MS. HARVIE: If you have got any  
18 follow-up questions it might be more efficient than  
19 doing it in writing.

20 MR. SHEPHERD: No problem.

21 THE CHAIRMAN: So we won't lose sight of  
22 it we will keep it on as number 8. We have already had  
23 a couple satisfied in that fashion so we can do it that  
24 way--

25 MS. HARVIE: Oh. All right.

1 THE CHAIRMAN: --so we won't forget about  
2 them.

3 MR. SHEPHERD: Excellent, Mr. Chairman.

4 Q. Let me take you to the main text of  
5 Exhibit 796, and on the second page you talk about --  
6 you refer to the fact that the September board  
7 memorandum wasn't enough to make a number of decisions  
8 because there was -- this is the quote here:  
9 additional analysis of the environmental leadership,  
10 legal and hearing implications, et cetera, et cetera,  
11 was required.

12 And I take it that that analysis was then  
13 done by October when the decisions were made; right?

14 MR. SNELSON: A. To some degree, he yes.

15 Q. Okay. And then I would find that in  
16 the October board memorandum which is attachment A,  
17 wouldn't I?

18 A. That is the documentation that  
19 supports the October board memorandum.

20 Q. But that additional environmental and  
21 similar analysis, that would be in this attachment A;  
22 right?

23 A. To the extent that it has been  
24 documented, yes.

25 Q. Okay. And I looked at this document



1 A and -- or attachment A, and if you look at page 5 of  
2 that, as I understand this heading, "Economic  
3 Evaluation of Capital Alternatives", the only ranking  
4 you have in fact provided to your board and you  
5 prepared for decision-making purposes, put it that way,  
6 is still an economic ranking; right?

7 A. Yes. That was available I believe in  
8 September as well.

9 Q. So it is the same economic ranking  
10 from September unchanged?

11 A. I believe so.

12 Q. Okay. And then I see that you have  
13 in -- I thought I saw... Wait a second. Here we are.

14 I see that on page 10 you have now some  
15 data on air emissions. That is new for October; right?  
16 [2:05 p.m.]

17 MR. DALZIEL: A. That's right.

18 Q. And I also see on pages 12 through 15  
19 a summary of each of the various recommendations  
20 together with sort of a brief encapsulization of the  
21 implications, some economic, some not economic, and so  
22 that includes some environmental and other analysis;  
23 correct?

24 MR. SNELSON: A. Yes.

25 Q. And that is also new from September?

1 A. Some parts of it is.

2 Q. Yes. Is there any other  
3 environmental analysis of these October decisions?

4 A. I think with the previous  
5 cross-examiner, Mr. Castrilli, we established that that  
6 was the -- the main part of the environmental analysis  
7 that was done. There was not a fully comprehensive  
8 environmental analysis similar to that that preceded  
9 Panel 10 or was given in Exhibit 4. We have already  
10 discussed that with Mr. Castrilli.

11 Q. Fine. Sorry. I didn't mean to go  
12 over the same ground again.

13 In these pages 12 to 15 I see a summary  
14 of the implications of changes to the demand management  
15 plan, to a number of hydraulic developments, the  
16 emissions control program, Manitoba, fossil stations.  
17 But, you know, at the very top of your list of economic  
18 ranking was a reduction in NUGs, and I didn't see that  
19 in here. Have I missed it?

20 A. I don't think there was any -- I  
21 don't think you've missed it.

22 Q. It is just not there?

23 A. There was a decision made in October  
24 with respect to further tightening of the NUG program,  
25 and that is point (h) on small Roman numerals (ii) of

1 the Executive Summary of Attachment A.

2 Q. It's correct, isn't it, that the only  
3 information in this board memo with respect to that is  
4 the economic ranking of the options?

5 A. Without careful reading of the  
6 document again with that in mind, I can't bring  
7 anything -- I can't bring anything to your attention  
8 additional to that.

9 Q. Great. I'm going to ask you to turn  
10 to attachment B, and this is -- I fear I'm going to get  
11 bogged down here. I'm going to ask you to turn to page  
12 20 of appendix A of attachment B to Exhibit 796.

13 Do you have that, Mr. Snelson?

14 A. I believe so, but perhaps if you can  
15 just tell us what the words are at the top we'll make  
16 sure we've got the same page in front of us.

17 Q. It starts out, "From the  
18 perspective..."

19 A. I have that page.

20 Q. Wonderful. Now, this document that  
21 we are in, this is the report of the Vice-Presidents'  
22 Review Team, right?

23 A. Yes.

24 Q. And this report was, in fact, tabled  
25 by the Chairman of Hydro to your board in September;

1 correct?

2 A. Yes, and there was a -- an Executive  
3 Summary that was added to that.

4 Q. Yes, of course. Okay. Page 19 and  
5 20 of this report, where I took you to, appear to me to  
6 discuss what to do about falling nuclear performance.  
7 And in essence, this appears to say Nuclear Operations  
8 Branch says, give us more money and things will get  
9 better, and the Committee of Vice-Presidents is saying,  
10 why should we believe you now. I'll read you the exact  
11 wording. It is on the top of page 20 where it says:

12 From the perspective of the  
13 Vice-presidents' Review Team the issue is  
14 one of credibility. If the planned  
15 capital and OM&A expenditures produce  
16 the forecast results they are clearly  
17 economic and will contribute to lower  
18 increases in rates for our customers.  
19 However, recent experience has seen  
20 significant increases in expenditures  
21 with no clear indications of improving  
22 results.

23 Now, that quote is referring to nuclear  
24 operations; isn't that correct?

25 A. Can you just give me a minute to

1 read--

2 Q. Sorry. Go ahead.

3 A. --the preceding page as well?

4 Sorry. Can you repeat your question now?

5 I've had a chance to read it.

6 Q. My question is the quote I just read  
7 to you, that refers to Nuclear Operation expenditures,  
8 doesn't it, I guess and capital as well?

9 A. Yes.

10 Q. Okay. And, if I understand the  
11 second paragraph there correctly, it says that the  
12 Vice-President of Nuclear Operations was asked to go  
13 back and look at his budget again; is that fair?

14 A. Yes. I think this is in the spirit  
15 that all vice-presidents were being challenged to  
16 review their budgets and keep them as far as possible  
17 in line with previous levels of budgets and avoid  
18 increases.

19 Q. So notwithstanding the issue being  
20 one of credibility, this is just normal "go look again"  
21 sort of discussions?

22 A. No, I don't think it's just normal  
23 "go ahead and look at things", but it is part of the  
24 larger process whereby all budgets are being  
25 challenged.



1 Q. I would like you to go to appendix 2  
2 to this report. We are now in appendix 2 of appendix A  
3 of attachment B, I should tell you. Appendix 2 is  
4 closer to the back. It is headed up "OM&A and Program  
5 Costs". And I assume that this first page, which is  
6 headed up "OM&A Program Costs, Corporate Improvements",  
7 September, '92. Do you see that page?

8 A. I have the page.

9 Q. Okay. That is the numbers coming out  
10 of the report of the vice-presidents, right?

11 MR. DALZIEL: A. Sorry. I was just  
12 organizing some pages. Could you repeat the question?

13 Q. Okay. In fact, maybe I will give you  
14 both questions together.

15 The first page, headed up "Corporate  
16 Improvement", that is the numbers coming out of this  
17 report of the vice-presidents, and the next page,  
18 reference level February, '92, is the numbers they  
19 started with; is that right?

20 A. That is my understanding.

21 Q. Okay.

22 A. That's right.

23 Q. Could you just hold your thumb there  
24 and go right to the back of this part of the package?  
25 This is right to the back of attachment B.

1                   Now, I have a page in there in my copy  
2           that also says "Corporate Improvements", September,  
3           '92. The only difference between this page and the  
4           earlier one we were looking at is that the earlier one  
5           has 10:11 a.m. on September 11th, and the other one,  
6           the one we were just talking about, has 6:05 p.m. on  
7           September 11th.

8                   Could you explain?

9                   A. There's a correction in the  
10          Information Management and Workplace Services line.

11                  Q. Okay.

12                  A. The one that was published at 6:05  
13          p.m. contains the corrections.

14                  Q. Excellent. So we should just ignore  
15          this page that has 10:11 on it? That's wrong, 10:11  
16          a.m.?

17                  A. Yes. I would use the one that is  
18          dated--

19                  Q. Great.

20                  A. --6:05 p.m.

21                  Q. Okay. Now, can you look at the  
22          reference levels for just a second? This is the second  
23          page of this schedule 2, headed up "Reference Level",  
24          February, 1992. There's a line there that says  
25          "Nuclear Operations".

1 Now, I'm going to get to the substantive  
2 questions on this, but let me just clear up a technical  
3 issue here.

4 If you look at the notes at the bottom -  
5 let's see if I can find it - the fourth line from the  
6 bottom, it says:

7 NOB - which is Nuclear Operations -  
8 does not include funds associated with  
9 boiler problems at Bruce and Pickering,  
10 \$30 to \$40 million in '92.

11 Why are those figures not included in the  
12 Nuclear Operations figures?

13 A. I can't tell you exactly the reason  
14 why those aren't included. It may be that the numbers  
15 are still under consideration and to determine the  
16 extent to which they should be included or when they  
17 would be included.

18 Q. Can you tell me, are they included  
19 anywhere else in this?

20 A. I don't know if they've been included  
21 in the first page that refers to the September, '92  
22 values. I believe that is what the note "not resolved"  
23 on the far right-hand side refers to, those kinds of  
24 considerations.

25 Q. All right. Can you confirm, Mr.

1 Dalziel, that the reference level budget that we have  
2 just looked at, the Nuclear Operations, increased in  
3 real dollars from 1991 to 1996, over five years, by 15  
4 per cent roughly?

5 A. Roughly that looks about right.

6 Q. All right. Now, that is a little bit  
7 of an understatement, isn't it, because isn't the line  
8 "COG Funding", isn't that also Nuclear Operations?

9 A. No, I don't believe it is.

10 Q. Well, isn't that the funding of the  
11 CANDU owners group?

12 A. Yes. It's the funding of the CANDU  
13 owners group, but it's not part of the Nuclear  
14 Operations Branch.

15 Q. Oh, sorry. I misworded my question.  
16 It, however, is an operating expense to do with  
17 nuclear, isn't it?

18 A. It may include more than just  
19 operating. It may include moneys for capital budgets.

20 MS. HARVIE: Mr. Chairman, if I may --

21 MR. DALZIEL: Now, this is --

22 THE CHAIRMAN: Just a moment.

23 MS. HARVIE: Mr. Dalziel, just a moment,  
24 please.

25 If I may just rise at this point, I am

1 hard pressed to understand why the details of the COG  
2 budget are relevant to Panel 11. They were at any rate  
3 discussed, I believe, on Panel 9, and I don't have any  
4 inkling how this is relevant to matters that have  
5 changed since Panel 10.

6 MR. SHEPHERD: Mr. Chairman, one of the  
7 issues in this hearing, as I understand it, is going to  
8 be the proper assumptions for nuclear operating  
9 escalators, capital modification escalators, et cetera.

10 I believe that through this set of  
11 questions I will be able to demonstrate that Hydro,  
12 which has for a long time said that it should be  
13 roughly inflation for those items, that in fact they  
14 are now projecting not only above inflation as they did  
15 last year but, even more than that, in a period of  
16 austerity.

17 Now, I think that that --

18 THE CHAIRMAN: But doesn't that speak for  
19 itself? I mean, the COG funding, we know what it is,  
20 and there it is, and those are the figures.

21 I mean, are there any questions you want  
22 to ask about them?

23 MR. SHEPHERD: No, I made my point on COG  
24 funding.

25 THE CHAIRMAN: All right.



1 MR. SHEPHERD: But I do wish to go on and  
2 ask additional questions about the nuclear operations  
3 budget and how it has changed.

4 THE CHAIRMAN: Well, you can do that.

5 MR. SHEPHERD: Okay.

6 Q. Mr. Dalziel, still on this reference  
7 level chart, if you look at the bottom of the page you  
8 will see notes, and there are a number of accounting  
9 changes associated with nuclear operations.

10 Now, I assume if we are looking at the  
11 increase in budget to see how it relates to inflation,  
12 for example, that we have to adjust for accounting  
13 changes because those aren't really increases or  
14 decreases; correct?

15 MR. DALZIEL: A. I guess it depends on  
16 the specific nature of the accounting change, but in  
17 general, yes.

18 Q. Okay. So we have got accounting  
19 changes for '95 and '96 for heavy water of, let's say -  
20 we'll look at '96 - \$62 million. As I understand that,  
21 the number in the chart above is \$62 million more than  
22 it would have been because of the accounting change,  
23 okay; isn't that true?

24 A. It may be that is \$62 million less.  
25 I think you said \$62 million more?

1 Q. No. My question is that the figure  
2 of 836 in 1996, 836.4--

3 A. Yes?

4 Q. --if it wasn't for the accounting  
5 change that would in fact be 898.6, wouldn't it?

6 A. That is what's indicated here, yes.

7 Q. Okay. So if that is the case, then  
8 it is correct that the real increase, if you compare  
9 apples to apples, is about 25 per cent over five years;  
10 correct?

11 A. Subject to check, it may be that  
12 much.

13 Q. Okay. Now, against the background of  
14 the comments I read to you earlier from the other  
15 report, I would like you to look at then the page  
16 before, which is actually I guess the last page of  
17 attachment B, the correcting page, okay, headed up  
18 "Corporate Improvements", September, '92, and it has  
19 the time dated -- time stamp at the bottom, 6:05 p.m.

20 I look at that and I see the indication  
21 for nuclear operations, the first line, the question --  
22 the notation "not resolved". Do I take it that is a  
23 reference back to the earlier reference that the  
24 Vice-President of Nuclear Operations Branch was told to  
25 go away and look again, or is it something else?

1                   A. I think that may be part of it, and  
2                   there may be additional factors as well, such as the  
3                   one you just highlighted, the accounting treatment on  
4                   heavy water.

5                   Q. Okay.

6                   MR. SNELSON: A. One of the factors you  
7                   have to take into account in reading this line is that  
8                   it is during a period when Darlington is coming into  
9                   service, and there are costs of people who work at  
10                  Darlington who up until the in-service dates of the  
11                  units will be capitalized and treated as part of the  
12                  capital cost of the station and on the in-service date  
13                  they become part of the operating budget of the  
14                  station.

15                  Q. Yes.

16                  A. So there is a natural increase in  
17                  this budget as the new plant comes into service.

18                  Q. Okay. Good. Do you know how much  
19                  that is?

20                  A. No. I think you -- in digging into  
21                  the details of this table you are into an area that  
22                  neither Mr. Dalziel nor myself are very familiar with.  
23                  We are attempting as best we can to answer your  
24                  questions, but it's not an area that we are very  
25                  familiar with.

1 Q. Okay. Well, I guess -- I only have  
2 one question on this anyway.

3 It seems to me there was a reference  
4 budget, which even adjusted was below \$900 million in  
5 1996, and the Corporate Improvement budget where you  
6 have slashed all the costs seems to me to show \$921  
7 million of nuclear operations. I guess I just don't  
8 understand what happened there.

9 Maybe you could explain.

10 [2:27 p.m.]

11 A. I don't think either of us is in a  
12 position to explain that and the factors behind that.

13 Q. On Wednesday we talked about the  
14 process of evolving these numbers, and I don't want to  
15 ask you to give me numbers that are still being evolved  
16 and haven't reached milestones, but this discussion  
17 does suggest that these nuclear operations numbers are  
18 in some sort of state of flux, and I wonder whether  
19 there is a new set of numbers that is at some sort of  
20 milestone stage that we could look at, that doesn't  
21 have a "not resolved" beside it.

22 A. As I say, this is an area of O&A  
23 budgeting which we are not really that familiar with.  
24 So there may be a new set of numbers associated with  
25 the -- a finalized '93 budget, but we're not aware of

1       them.

2                   Q.   I won't ask for an undertaking. I  
3       presume that sort of data would be filed in any case;  
4       correct?

5                   MS. HARVIE:   Well, assuming that it would  
6       be relevant -- and I'm not sure the witnesses are  
7       suggesting that it would be at all.  In fact, the  
8       evidence would suggest that it isn't.

9                   MR. SHEPHERD:  Q.  Could you look at  
10      attachment H to Exhibit 796, please?  I don't know who  
11      this is that...  It's a collective "you".

12                   And if you take a look at page 3 of  
13      schedule 1 of that attachment, it says here -- no, I  
14      asked that already.  Excuse me just a second.

15                   Sorry.  When I was skipping around I lost  
16      track of what I had asked and what I hadn't asked.

17                   Under this heading "Nuclear" here, it  
18      says:

19                   A prioritized submission for all  
20      nuclear work should be submitted.

21      Is that a document that we could look at?

22                   MR. SNELSON:  A.  I don't know.

23                   Q.  I wonder if you could just undertake  
24      to find out and provide it, if you haven't.

25                   MS. HARVIE:  Well, this may well be part



1 of the Bruce "A" review, and there isn't anything that  
2 has been finalized in any way. And so, I have no  
3 confidence that this has been finalized either, or  
4 indeed whether it's -- well, just what shape it is in.  
5 I don't know. And so I don't know that we could give  
6 an undertaking at this time.

7 MR. SHEPHERD: Mr. Chairman, I'm not  
8 asking for anything that hasn't been finalized. If a  
9 document has been finalized, I'm asking that it be  
10 tabled, that's all.

11 THE CHAIRMAN: This schedule 1 is an  
12 attachment to a letter or a memorandum from the CEO to  
13 the senior management committee, generally instructing  
14 them what he would like to have happen in the near  
15 future. It was put in, basically, to provide  
16 continuity.

17 I guess the question is whether this kind  
18 of submission is an internal management submission or  
19 whether it's something that Hydro wants to bring  
20 forward as part of its policy. That is the issue about  
21 it.

22 MS. HARVIE: Well, Mr. Chairman, I  
23 suppose I could respond to that.

24 I don't know if there is a document at  
25 all or what shape it is in, whether it is in draft form

1 and has never been finalized. And if that's the case,  
2 then it would be my submission that it is a draft  
3 document and doesn't reflect necessarily a corporate  
4 position that would be probative evidence in this  
5 hearing.

6 THE CHAIRMAN: I suppose anything that  
7 comes into the planning mode and becomes part of the  
8 tools used by planners to make decisions, then it would  
9 be relevant; is that correct?

10 MS. HARVIE: Well, yes, that's correct.  
11 I'm not sure that that is what the witnesses have said.

12 THE CHAIRMAN: I'm not sure they said  
13 anything about it one way or the other. (Laughter)

14 What about it, Mr. Snelson? Will you  
15 provide anything that goes into the planning that you  
16 use as a tool for planning the proponent's position?

17 MR. SNELSON: This document is not  
18 something that would be considered in long-term  
19 planning. It seems to be something that is part of the  
20 short-term budgeting, particularly in the period of  
21 constraint in the next few years.

22 MR. SHEPHERD: Mr. Chairman, I may be  
23 wrong, but I believe that what this document if it  
24 exists and is final is, is a list of all the things  
25 they have to fix on the existing system nuclear

1 stations and the order in which they have to fix them.

2 And given the fact that we are depending  
3 almost entirely on the existing system and heavily on  
4 nuclear over the next 20 years, I would have thought  
5 that what needs to be fixed is real important.

6 THE CHAIRMAN: I thought that was the  
7 subject matter of Panel 9, and if there has been any  
8 change in Panel 9 from that, that that would be part of  
9 what we have before us.

10 MR. SHEPHERD: Exactly. And I'm  
11 saying --

12 THE CHAIRMAN: That is, I guess, the form  
13 the questions ought to take.

14 MR. SHEPHERD: Well, Mr. Chairman, given  
15 that --

16 THE CHAIRMAN: We had quite a bit of  
17 evidence in Panel 9 about what needs to be fixed, and  
18 when it needs to be fixed, and if it needs to be fixed,  
19 and we know that there is the Bruce "A" study going on,  
20 and we know all about that; and I think if you can put  
21 your questions in that context rather than the context  
22 of this particular document, then we might be able to  
23 get the answers.

24 MR. SHEPHERD: Mr. Chairman, Hydro has  
25 filed a piece of paper that says that they have a

1 new -- or they are preparing some sort of new document  
2 on what needs to be fixed. I don't know whether they  
3 are in fact.

4 THE CHAIRMAN: No, no. That is not what  
5 this says.

6 This is the Chairman writing to his  
7 Vice-Presidents asking for some help and advice during  
8 the summer, and he's got all kinds of ideas that he  
9 wants. They may have said, very possibly could have  
10 said, you have got that, or you don't need that, or  
11 whatever.

12 This is just a continuity document. I am  
13 not going to take any more questions in that context.

14 MR. SHEPHERD: Well, Mr. Chairman, I  
15 haven't finished making submissions on the relevance of  
16 this.

17 THE CHAIRMAN: If we can move --

18 MR. SHEPHERD: I never got a chance to  
19 make a submission on the relevance of this. Hydro's  
20 counsel did; I did not. I waited. Can't I make a  
21 submission on it?

22 THE CHAIRMAN: If you want to.

23 MR. SHEPHERD: Thank you.

24 Hydro has filed a document that says  
25 something which looks like a document has been

1 requested, and it looks like it is about what has to be  
2 fixed in nuclear.

3 Given that document could have no changes  
4 in it from what we heard in Panel 9, in which case  
5 there would be no reason for it to be before this  
6 Board, and that would be a perfectly legitimate answer  
7 for these witnesses or for Hydro to give.

8 However, if it does have changes in it,  
9 then that is changes to evidence that is before this  
10 Board, and I believe that as a matter of clear law all  
11 of the parties here and the Board are entitled to see  
12 that.

13 If it does not have changes, they can say  
14 it doesn't have changes. I'm happy.

15 If it does have changes, I don't see  
16 where there is an issue here.

17 THE CHAIRMAN: Well, I did suggest a way  
18 in which you could get the information you need. I  
19 will not let you ask any more questions in that  
20 context.

21 It seems a simple thing to ask them. If  
22 there have been any changes in those matters since the  
23 Panel 9 evidence, that is a simple question to ask  
24 them, and they can answer it or undertake to find out.

25 MS. HARVIE: I think the answer is quite



1 clearly stated on the record at other times -- I'm  
2 sorry, it appears at page 21 of Exhibit 796 it says:

3 There has been no significant change  
4 in the information regarding major supply  
5 options since Panels 7, 8, 9 and 10.

6 MR. SHEPHERD: I didn't think I was  
7 talking about major supply options. I thought I was  
8 talking about existing system. But I may be wrong  
9 here.

10 In any case, Mr. Chairman, with your  
11 ruling I have no further questions of this panel.

12 THE CHAIRMAN: Who is next?

13 MR. NUNN: Mr. Grenville-Wood.

14 THE CHAIRMAN: Who is after Mr.  
15 Grenville-Wood? Mr. Watson?

16 MR. WATSON: I am, Mr. Chairman.

17 THE CHAIRMAN: Are you ready to go?

18 MR. WATSON: No. I wasn't expecting Mr.  
19 Shepherd to leave us this early.

20 THE CHAIRMAN: We will adjourn until  
21 tomorrow morning at nine o'clock.

22 THE REGISTRAR: Please come to order.  
23 This hearing will adjourn until nine o'clock tomorrow  
24 morning.

25

1  
2 ---Whereupon the hearing was adjourned at 2:39 p.m.,  
3 to be reconvened at nine o'clock on Tuesday, January  
4 12th, 1993.  
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